EXHIBIT 2

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Page 1
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                  UNITED STATES DISTRICT COURT
                      DISTRICT OF VERMONT
 2
 3
     JAMES D. SULLIVAN, et
     al., individually, and
 4
     on behalf of a Class of )
 5
     persons similarly
                              )
     situated,
                                  Civil Action No.
                              )
                                   5:16-cy-00125
 6
                              )
              Plaintiffs,
                              )
 7
                              )
        vs.
 8
     SAINT-GOBAIN
 9
     PERFORMANCE PLASTICS
     CORPORATION,
10
              Defendant.
11
12
13
                  VIDEOTAPED DEPOSITION OF LESLIE ADDISON,
14
          taken pursuant to notice before Beth Gaige,
15
          Registered Professional Reporter, at the
          offices of BarrSternberg Moss Silver & Munson,
16
17
          P.C. 507 Main Street, Bennington, VT, on
18
          April 13, 2018, commencing at 9:33 a.m.
19
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STIPULATION

(It is hereby agreed by and between the parties that signature is not waived.)

THE VIDEOGRAPHER: We are now on the Please note that the microphones are sensitive and may pick up whispering and private conversations. Please turn off all cell phones or place them away from the microphones as they can interfere with the deposition audio. Recording will continue until all parties agree to go off the record.

My name is Edward Roy, representing Veritext. The date today is April 13th, 2018. The time is now approximately 9:33 a.m.

This deposition is being held at BarrSternberg Moss Silver & Munson, P.C., located at 507 Main Street, Bennington, Vermont, and is being taken by counsel for the defendant.

The caption of the case is James D. Sullivan, et al, individually and on behalf of a class of persons similarly situated, Plaintiffs, versus Saint-Gobain Performance Plastics Corporation, Defendant.

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Page 5 1 This case is filed in the United States 2 District Court, District of Vermont, Civil 3 Action No. 5:16-CV-00125. The name of the witness is Leslie Addison. 4 5 At this time the attorneys present in the 6 room and attending remotely will identify 7 themselves and the parties they represent. 8 MS. SCHWARZ: Marina Schwarz for 9 Saint-Gobain Performance Plastics. 10 MR. WILLIAMS: Nathan Williams for 11 Saint-Gobain Performance Plastics. 12 MR. SILVER: David F. Silver for the 13 plaintiff. 14 MS. JOSELSON: Emily Joselson for the 15 plaintiff. 16 THE VIDEOGRAPHER: Will Attorney David 17 Silver, representing BarrSternberg Law, please 18 swear in the witness and we can proceed. 19 (The Witness was administered the oath.) 20 LESLIE ADDISON, having been duly sworn by the 21 Notary Public, was examined and testified as 22 follows: 23 DIRECT EXAMINATION 24 BY MS. SCHWARZ: 25 Q. Good morning, Miss Addison.

Page 6 1 Hello. Α. 2 Q. And I know we introduced ourselves off the 3 record briefly, but if you could, could you please state your name for the record? 4 5 Leslie Addison. Α. 6 Ο. And have you ever been deposed before? 7 Α. I have. 8 When was that? 0. 9 Α. About 20 years ago. 10 Miss Addison, my name is Marina Schwarz, and I Q. 11 represent the Defendant Saint-Gobain in this 12 litigation. 13 Do you understand that? 14 Α. (Nod) 15 And I'm sure your attorneys went over some of Q. 16 the basic ground rules, but if -- if you could 17 bear with me I'd like to go through a few of 18 them with you. 19 Α. Okay. 20 So there's going to be times where Q. Okay. 21 you're going to know exactly where I'm headed 22 with my questions, and it's just natural to 23 want to kind of provide the answer before I'm 24 done; but if you could wait until I finish my 25 question before answering, I think that would

Page 7 1 be helpful for the court reporter here. 2 Does that make sense to you? 3 Α. Yes. Great. And if you don't understand a question 4 Q. 5 I've asked, please just let me know, and I can 6 clarify it. 7 Α. Okay. 8 If you don't let me know, I'm going to go 0. ahead and assume that you did understand it. 9 10 Is that fair? 11 Yes. Α. 12 Okay. And, like I said, we have a court Q. 13 reporter here taking down everything that 14 we're saying, so it's very important to give 15 verbal responses. So try not to shake your 16 head, say mm-hmm or uh-uh and that would -- I 17 will try to do the same. Okay? 18 Okay. Α. 19 And then finally, we might get into some 20 personal or sensitive sort of areas due to the 21 nature of the litigation. It's not my 22 intention at all to make you feel 23 uncomfortable or embarrassed in any way. 24 you do, just let me know, and I'll see if we 25 can't work through it. Okay?

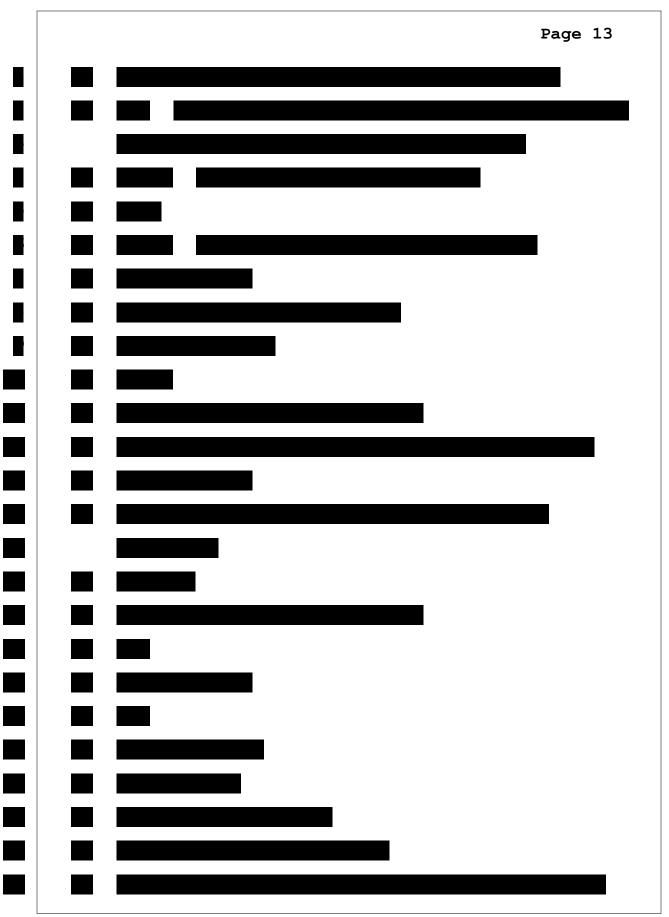
Page 8 1 Α. Okay. 2 Q. You mentioned you were deposed 20 years ago; 3 is that right? Yes. 4 Α. 5 And what was the nature of the -- was it --0. 6 was it in a litigation? 7 I don't know -- I don't know, but it was a Α. 8 lawsuit involving a boss that I had at the 9 time who was engaging in a lawsuit against the 10 company I worked for. 11 What company was that? Q. 12 Α. Northeast Career Planning. 13 Q. And did you testify at a -- at trial? 14 I was deposed. Α. 15 Q. And were you there on behalf of the company 16 that you were working for? 17 I was asked to be there because I worked for Α. 18 the company. 19 Q. Okay. 20 Α. If that's what you mean. 21 Ο. Yes. And was it an employment action? 22 Α. Yes. 23 Ο. Okay. Miss Addison, did you do anything to 24 prepare for today's deposition? 25 Α. I've had conversations with my attorneys to

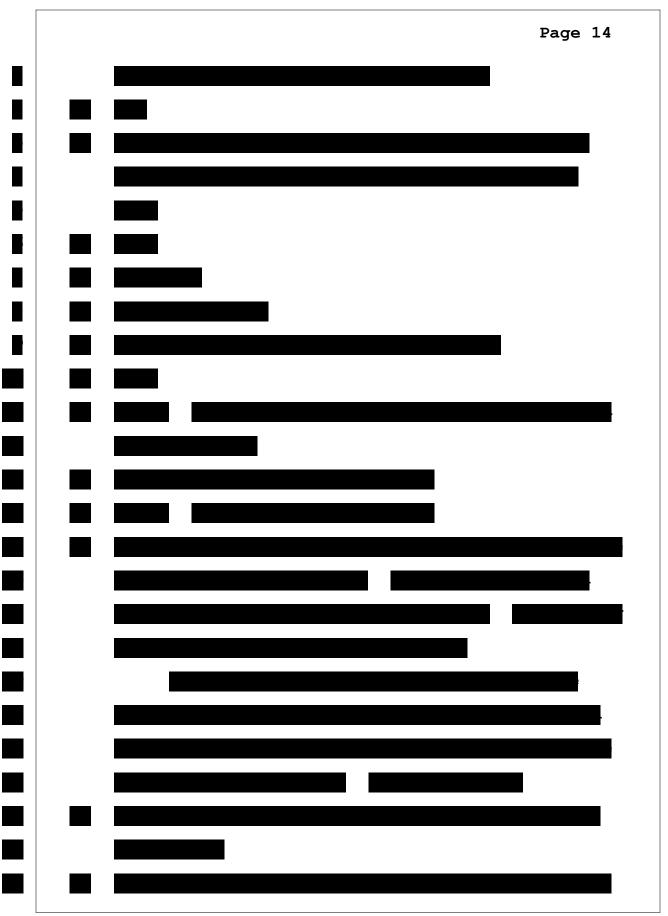
Page 9 1 become familiar with the process. 2 Q. And I absolutely do not want to know anything 3 that you discussed with your attorneys. That's privileged information. 4 5 But can you tell me, did you review any 6 documents to prepare for today? 7 I had meetings with my attorneys, and that's Α. 8 where I prepared for the deposition. 9 Q. Do you recall reviewing any -- any documents? 10 Α. Yes. 11 And in general what categories of documents 0. 12 did you review? 13 Α. They were documents that were supplied to you 14 on our behalf. They were documents that we 15 provided in response to questions that you had 16 asked from us. That sort of thing. 17 Q. And did they include medical records? Α. 18 I did not get copies of my medical records. 19 did receive some. I take that back. I recall 20 that I did get a couple, but I didn't get the 21 complete set. 22 And property records? Q. 23 Yes. Yeah. Α. 24 And I'm sorry to ask this, but how old are Q. 25 you, Miss Addison?

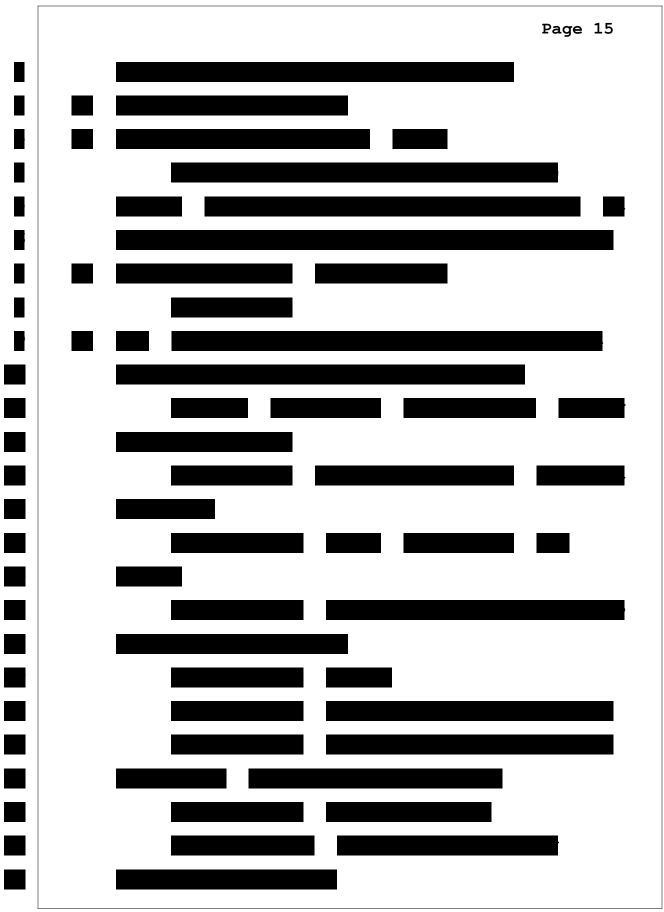
Page 10 1 I'm 56. Α. 2 Q. Okay. And what's your date of birth? 3 11/30/61. Α. And have you ever gone by any other name? 4 Q. 5 Α. Johnas. 6 0. Could you please state your current address? 7 35 Asa's Way, North Bennington. Α. 8 And I'm sorry. You said North Bennington, Q. 9 Vermont? 10 Α. North Bennington, yes. 11 How long have you lived at 35 Asa's Way? Q. 12 Α. Since 2008. 13 Q. Prior to moving to 35 Asa's Way, did you live 14 anywhere else in Bennington? 15 Α. Yes. 16 And where was that? 0. 17 That was on South Street from August until we Α. 18 moved into the house of that same year. 19 So from August of 2008 --Q. 20 Α. 2008. 21 -- and until? Ο. 22 Α. December 2008. 23 Ο. And the home on South Street, was that an 24 apartment or a house? 25 Α. It was a house, and we rented part of it.

Page 11 1 When you say part of it, was it a duplex? 2 Α. It was a downstairs/upstairs, and we had the 3 downstairs. Were there tenants upstairs? 4 Q. 5 Α. Yes. 6 0. Yes? And who lived with you at South Street? 7 Α. My husband Jim, my sons Nick and Luke and my 8 stepdaughter Kerry. 9 Q. Prior to 2008, had you been to North 10 Bennington -- I'm sorry. Withdrawn. 11 Prior to 2008 had you visited Bennington? 12 Α. Yes. 13 Q. When was the first time that you visited 14 Bennington, Vermont? 15 Visited? Α. 16 When was the first time you -- you went 0. 17 to Bennington, Vermont? 18 Α. The first time I've been to Bennington? 19 Yeah. 0. 20 I don't remember -- I can't say that I Α. 21 remember exactly, because I grew up in 22 Pittsfield, Mass, so I probably travelled 23 through town. 24 Q. Okay. 25 Α. But when I was raising my children, when I

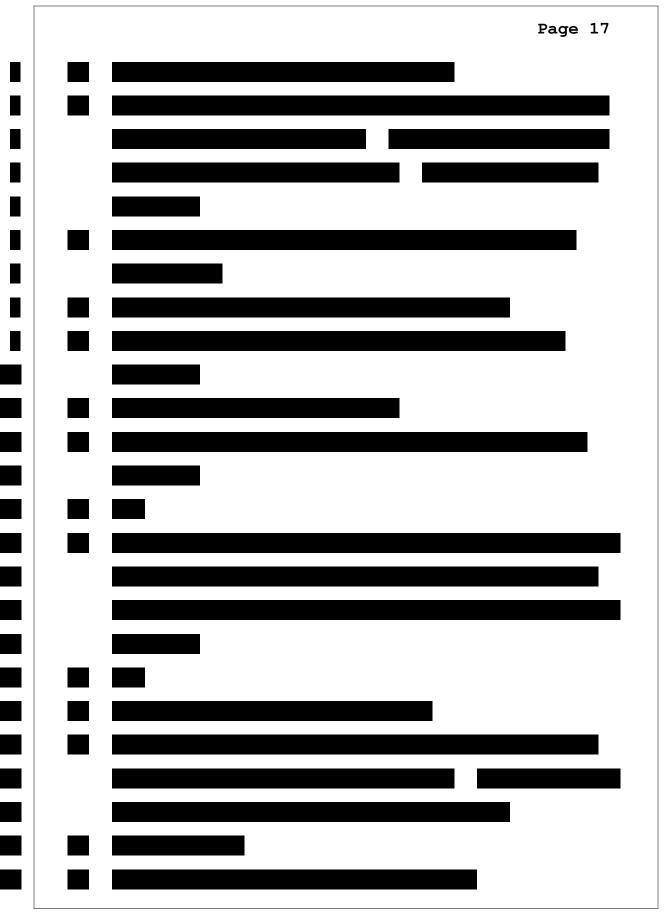
Page 12 1 lived in New York, we would occasionally take 2 a drive into Bennington for breakfast. Q. 3 How far away is that -- approximately is 4 Pittsfield from Bennington, would you say? 5 Α. Pittsfield? 6 0. Yes. 7 It's about 50 miles. Α. Did you say 15 or --8 Q. 50. 5-0, 50. 9 Α. 10 Prior to 2008, had you lived in Bennington, Q. 11 Vermont? 12 Α. No. 13 Q. How about North Bennington, Vermont? 14 No. Α. 15 Other than Asa's Way and South Street, did you Q. 16 live anywhere else in North Bennington? 17 Α. No. 18 Q. And you mentioned you were married to Mr. 19 Sullivan; is that correct? 20 Yes. Α. 21 And Mr. Sullivan is also a plaintiff in this Ο. 22 lawsuit? 23 Α. Yes.

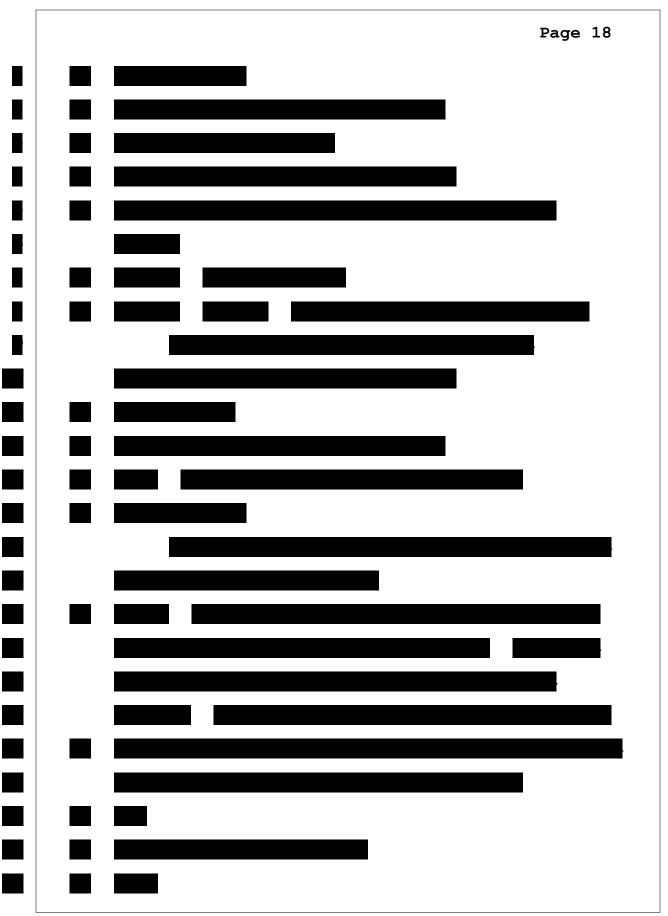


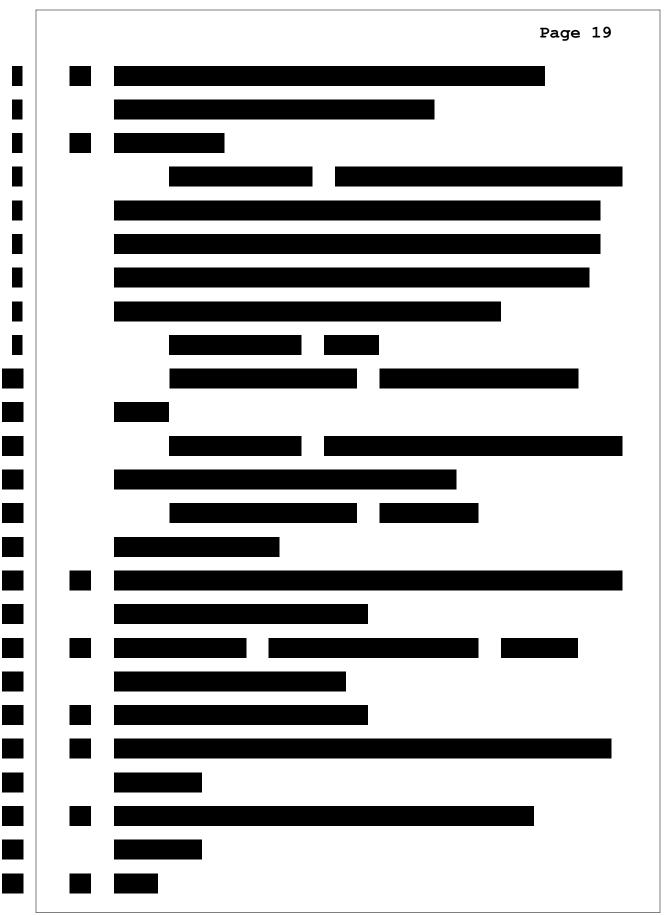












Page 20 Where did you live prior to South Street? 11 Q. 12 Α. In Niskayuna, New York. THE REPORTER: I'm sorry. Say that name. 13 14 THE WITNESS: Niskayuna, 15 N-i-s-k-a-y-u-n-a. Niskayuna, New York. 16 BY MS. SCHWARZ: 17 And can you give us the address, please? Q. 18 2336 Almeria, A-1-m-e-r-i-a, Road. Α. 19 And who lived with you at the Almeria Road Q. 20 home? 21 Well, when I left there, I -- my -- my -- I Α. 22 was divorced, but for my duration there, it 23 was all of children and my then husband. 24 When did you move into Almeria Road? Q. 25 1986. Α.

Page 21 1 And when did you move out? Q. 2 In 2008. Α. 3 Ο. And was it a house or an apartment? Mm-hmm. It was a house. 4 Α. 5 Was it preowned or did you build it? 0. 6 Α. It was preowned. 7 Okay. Do you know approximately how old Q. 8 the -- the home was? I don't recall exactly. I think it was maybe 9 Α. built in the '20s. I'm kind of guessing a 10 11 little bit. 12 Did you do any renovations to the home? Q. 13 Α. Yes. 14 MS. JOSELSON: I'm going to have to just 15 object that the questions seem to be quite far 16 afield of PFOA in Bennington, asking about 17 renovations in a home that she owned in the '80s. 18 19 MS. SCHWARZ: The speaking objection is 20 noted. Objection is just fine. 21 BY MS. SCHWARZ: 22 You may answer. Q. 23 Α. Yes. 24 MS. JOSELSON: She did answer. 25 MS. SCHWARZ: You interrupted her. Ι

		Page 22
1		didn't hear the answer, counsel.
2		BY MS. SCHWARZ:
3	Q.	I'm sorry. Yes?
4	A.	Can you repeat the question?
5	Q.	Sure.
6		Did you do any renovations to the home
7		after moving in?
8	A.	Yes.
9	Q.	Okay. Can you generally describe those
10		renovations?
11	A.	New Sheetrock, new windows, general repairs.
12	Q.	When you moved in, was there carpeting in the
13		home?
14	A.	Yes.
15		MS. JOSELSON: I'm also going to object
16		to the extent any of this goes beyond the
17		general 20-year timeline that the Court has
18		identified as relevant.
19		MS. SCHWARZ: The objection is to form.
20		That's the you know that.
21		MS. JOSELSON: We have
22		MS. SCHWARZ: I'm not sure what the
23		basis
24		MS. JOSELSON: Counsel, we've done no
25		stipulations in this case. I make my

Page 23 1 objections for the record. 2 MS. SCHWARZ: Are you suggesting that you can have speaking objections throughout this 3 deposition? 4 5 MS. JOSELSON: I will make my objections. 6 MS. SCHWARZ: We will be here for quite 7 some time then. 8 BY MS. SCHWARZ: Miss Addison, you can go ahead and answer. 9 Q. 10 Can you repeat the question? Α. 11 Sure. 0. 12 Was there carpeting in the home when you 13 moved in? 14 I believe there was. Α. 15 Q. And did you leave it or did you take it out, 16 change the flooring? 17 We removed it. Α. 18 You moved in in 1986, correct? Q. 19 Yes. Α. 20 And do you know approximately how long you Q. 21 lived with the original carpet before you 22 removed it? 23 We didn't. We removed it before we moved in. Α. 24 Q. So you had it removed before you moved in, and did you replace it with carpeting? 25

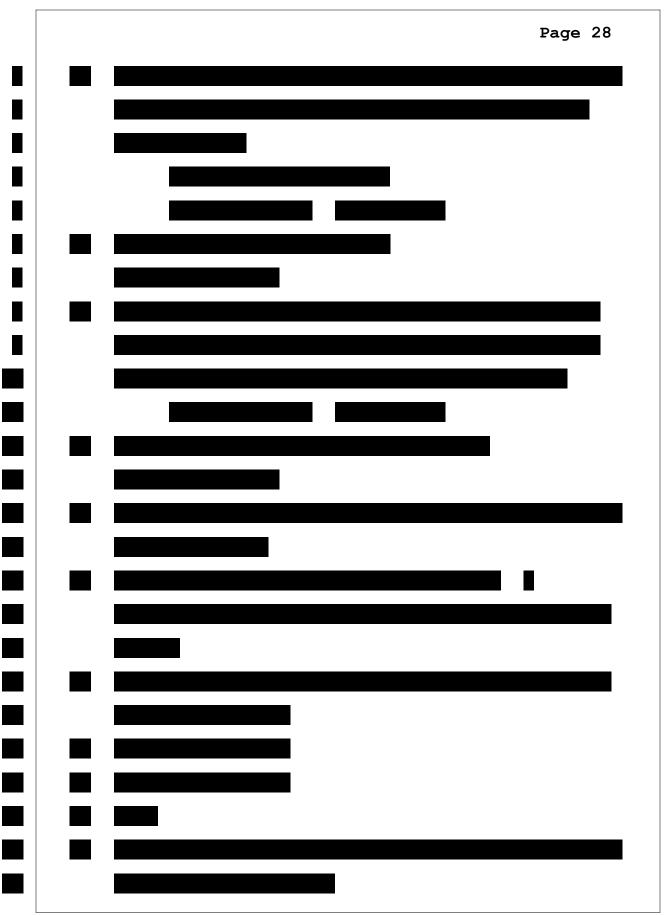
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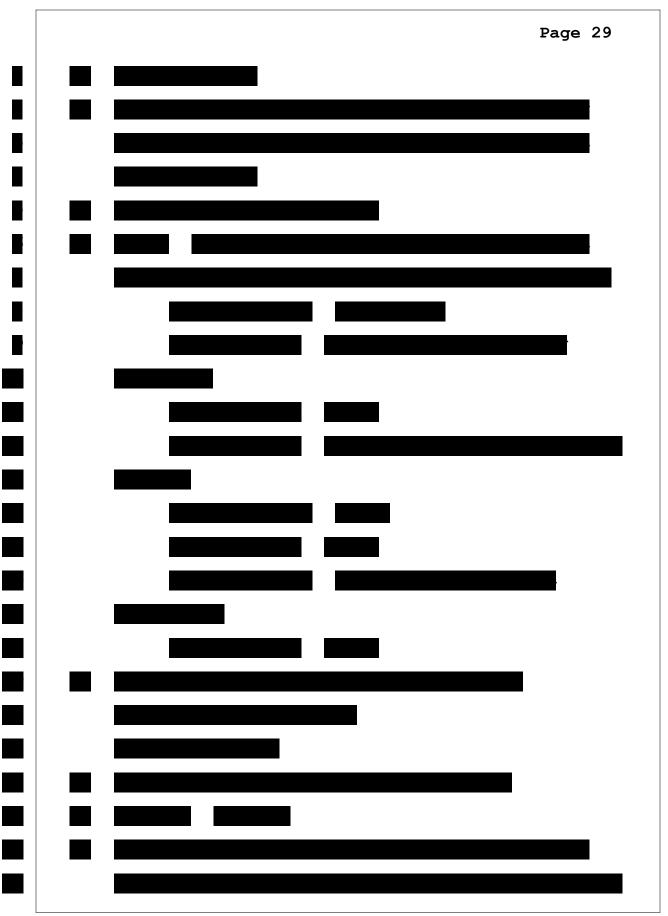
- 1 A. No. Hardwood floors. That was already there.
- We just cleaned the floors up.
- Q. And there was no other carpeting in that home?
- 4 A. When we moved in or while --
- 5 Q. Yes.
- 6 A. -- I was there?
- 7 Q. When you -- when you first moved in.
- 8 A. We removed it all.
- 9 Q. And was that before moving in or --
- 10 A. It was before --
- 11 Q. -- or sometime after moving in?
- 12 A. It was before moving in. We basically gutted
- the house.
- 14 Q. Were the renovations complete at the time you
- 15 moved into the home --
- 16 A. Yes.
- 17 Q. -- as far as the flooring goes? I'm sorry.
- 18 A. Mm-hmm.
- 19 Q. Miss Addison, where did you grow up?
- 20 A. In Pittsfield, Massachusetts.
- 21 Q. Did you spend any time near Silver Lake when
- 22 you lived in Pittsfield?
- 23 A. Did I spend time near it? Can you --
- 24 Q. Yeah.
- 25 A. -- clarify the question?

Page 25 1 Ο. Sure. 2 Well, do you recall did you ever drive by 3 Silver Lake? Did you live near Silver Lake? It was -- Silver Lake --4 Α. 5 MS. JOSELSON: Object. 6 But you can answer. 7 If I'm remembering it right, because I might Α. 8 not be, I think that was over near GE, and I 9 lived in West Pittsfield, which was on the 10 other side of town. So I probably drove by it 11 on my way to Allen Dale section of town. 12 BY MS. SCHWARZ: And have you heard of the GE Pittsfield 13 Q. 14 Housatonic River environmental issues? 15 Α. Yeah. 16 Can you tell me what you know about that? 0. 17 I believe there is and has been an issue with Α. 18 PCBs -- PCP, PCB -- I might be saying it 19 wrong -- in the river. 20 And how did you come to know that? Q. 21 Α. Just awareness growing up in Pittsfield. 22 Other than your understanding or -- you Q. 23 believe that it might have been an issue with 24 PCBs, is there anything else that you can tell me about the site? 25

		Page 26
1		MS. JOSELSON: Object to the form.
2	A.	I'm not sure I understand the question.
3		BY MS. SCHWARZ:
4	Q.	Sure.
5		Is there anything else that you recall or
6		that you know about sort of in general the
7		Housatonic River, Pittsfield site?
8		MS. JOSELSON: Objection.
9	A.	When you say site, I'm not sure what you mean
10		by that.
11		BY MS. SCHWARZ:
12	Q.	Oh, sure.
13	A.	Because the Housatonic River is a whole river.
14	Q.	Right.
15	A.	So what site do you mean?
16	Q.	The so I'm asking specifically about the
17		contamination.
18		Is there anything else that you know
19		about it, other than fact that it might be
20		related to PCBs?
21	A.	No.
22		MS. JOSELSON: Objection.
23		BY MS. SCHWARZ:
24	Q.	And what's the highest level of education that
25		you obtained?

Page 27 1 I have a bachelor's degree. Α. 2 Q. In what? 3 Α. Social work. It's actually sociology, slash, social work. 4 And where did you go to college? 5 Ο. 6 Α. College of Saint Rose in Albany, New York. 7 Did you attend graduate school? Q. 8 Α. I did not. Did you take any classes? 9 Q. 10 Α. No. 11 You may have mentioned this, but where do you 0. 12 currently work? 13 Α. At United Counseling Service. 14 Where is that located? 0. 15 Α. It is on Dewey Street in Bennington. 16 Can you just generally describe your 0. 17 responsibilities there? I'm the director of human resources. 18 Α. 19 Okay. And day to day what is it that you do Q. 20 as director of human resources at United 21 Counseling Services of Bennington? 22 Α. I would say personnel management, recruitment, 23 staffing, benefits, employee engagement and 24 retention, staff development and training, 25 problem solving.





Page 30 6 Q. How long have you worked at the United 7 Counseling Services? 8 Since April of 2011. Α. 9 Q. And prior to United Counseling Services where 10 did you work? 11 At Northeast Career Planning. Α. 12 And where is that located? Q. 13 Α. Their -- their administrative main building is 14 in Menands, New York. 15 Approximately how long would your commute be Q. 16 from North Bennington to Menands? 17 About 47 minutes. Α. 18 And what was your title at Northeast Career Q. 19 Planning? 20 When I left, it was director of employment Α. 21 services. 22 Q. Would that have been in 2011? 23 Yes. Α. 24 Q. And when you started, what was your title? 25 Α. Job placement assistant.

Page 31 1 Q. In what year? 2 That was in 1983. Α. 3 Ο. 1983? Α. Yes. 4 5 0. Good for you. Can you just sort of -- let's start with 6 7 in 1983, approximately what were your job 8 duties at Northeast Career Planning? 9 MS. JOSELSON: Object. 10 So my role was to help people with Α. 11 disabilities obtain employment. 12 BY MS. SCHWARZ: 13 When you say people on disabilities, were they Q. 14 residents of Menands? 15 Α. No. No. 16 0. Okay. 17 They may have been, but it was not excluded by Α. 18 that, you know, where they lived. 19 And what was your next title? Q. 20 I believe it was job placement counselor. Α. 21 And approximately what year were -- were you Ο. 22 promoted -- well, you were director of, did 23 you say, human resources in 2011? 24 Α. No. Director of employment services. 25 Q. Employment services.

Page 32 1 And what year did you acquire that title? 2 Α. My final title? 3 0. Yes. I know that that was one of the questions that 4 Α. 5 we supplied to you, so I'm -- I would probably be more accurate to check with that, but I 6 7 think I held that title for about four or five 8 years before I left. 9 Q. Okay. And did your work at Northeast Career 10 Planning require you to travel? 11 We had multiple worksites -- office locations, Α. 12 so I would travel between office locations. 13 So from 2008 to 2011, while you were at Q. 14 Northeast Career Planning, you would be 15 commuting approximately 47 minutes from your 16 home at Asa's Way? 17 Α. At the time I -- there was a period of time 18 where I had an office in Troy, which made the 19 commute a little bit shorter. I think I could 20 do it in about 41 minutes. 21 You mentioned multiple sites that you would go 22 see. Was that -- was that on a daily basis?

department. So depending on, you know, where

had meetings with staff. It was a large

It would -- it would depend on whether I

Α.

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Page 33 1 there might be a need, a meeting, a purpose, I 2 would go between any number of locations in 3 the greater Albany region. Sometimes it involved driving up to offices that we had in 4 5 the greater Saratoga region, as well. 6 0. Did you have an office where you were based 7 out of? Α. 8 Mm-hmm. 9 Ο. And where was that? 10 Α. Where was that? 11 Ο. Yes. 12 That changed, too, over the 27 years I was Α. 13 there. So depends on when you're talking. 14 How about between 2008 and 2011? Ο. 15 Α. Between 2008 and 2011. I can't recall exactly 16 when I moved to the Troy office. Prior to 17 that I was at our Colbin Avenue office in 18 Albany, I think. And I'm sorry, I'm not 19 exactly remembering when my office changed. Ι 20 just know when I left it was in -- it was out 21 of Troy. 22 No need to apologize. Q. 23 It may have been our Schenectady office, and Α. 24 then I moved to Troy, but I'm really not 25 remembering.

Page 34 1 Q. Okay. And how about prior to Northeast Career 2 Planning, where did you work? 3 Α. So prior to Northeast Career Planning I was in college. So it was the jobs that we provided, 4 5 to the best of my recollection. So it was in 6 between semesters part-time jobs so... 7 And one of -- I believe one of the responses Q. 8 you provided was that -- a nurses aide at 9 Springside Nursing Home. 10 Does that sound accurate? Mm-hmm, mm-hmm. 11 Α. 12 That was in Pittsfield --Q. 13 Α. Yes. 14 -- Massachusetts? 0. 15 Α. Yes. 16 And do you recall what you did as a nurses 0. 17 aide? 18 MS. JOSELSON: Objection. 19 We would help bathe elderly residents, help Α. 20 dress and bring their food. That sort of 21 thing. 22 BY MS. SCHWARZ: 23 And you moved into your current home at 35 Q. 24 Asa's Way, you said, in approximately December

of 2008, right?

25

Page 35 1 Mm-hmm, yes. Α. 2 Q. Was construction complete on your home when 3 you moved in? When you say construction, what do you mean? 4 Α. 5 Was there anything that was, you know, was not Ο. 6 yet -- unfinished, so to speak? 7 MS. JOSELSON: Objection. 8 Α. The core building was complete, but we've 9 added and enhanced and done things over the 10 years that we've been there, so I don't know 11 if that quite answers your question. 12 BY MS. SCHWARZ: 13 Q. Sure. Do you have a basement at 35 Asa's Way? 14 It's -- the house is built into a hill, so I Α. don't consider it a basement. 15 There's a 16 garage and a ground floor where we have a 17 family room. So it's not a basement where 18 you're going under the ground. It's built 19 into a hill, so I would consider it a ground 20 floor. 21 At the time you moved in in 2008 into 2009, 22 was there any renovations or any construction 23 that was going on while you were living in the 24 home? 25 Α. So let's see, I'm trying to recall when we

Page 36 1 put -- we put solar panels up. We put a shed 2 in the backyard. I don't recall what years we 3 did those. That's all I can remember. Okay. And prior to the detection of PFOA in 4 Q. 5 North Bennington, were you aware of the former 6 Saint-Gobain or ChemFab facility on Water 7 Street? 8 I know of -- I know of the building because I Α. 9 would drive by it. I didn't know what its 10 history or, you know, manufacturing was, no. 11 Had you heard of ChemFab at the time? Ο. 12 MS. JOSELSON: Objection. 13 BY MS. SCHWARZ: 14 0. I'm sorry. Withdrawn. 15 Had you heard of ChemFab prior to the 16 discovery of PFOA in North Bennington? 17 I don't -- I don't know. Α. 18 Had you heard of Saint-Gobain Performance Q. 19 Plastics? 20 MS. JOSELSON: Objection. 21 I -- I don't -- I don't know in 2008 if I --Α. 22 if I knew of them. 23 BY MS. SCHWARZ: 24 Q. At any time prior to the detection of PFOA? 25 Α. I don't think so, no.

Page 37 1 Had you heard of the former ChemFab facility 2 at 108 North Side Drive? 3 MS. JOSELSON: Objection. When? BY MS. SCHWARZ: 4 5 Prior to the detection of PFOA in North Q. Bennington? 6 7 Α. No. 8 How far approximately do you live from the 0. 9 Bennington landfill? 10 Driving or, like, point to point? Α. 11 Let's start with driving. 0. 12 Let's see, driving it's approximately, I'd Α. 13 say, about a mile and a half-ish. Maybe two 14 miles-ish. 15 At the time you moved in in 2008, did you have Q. 16 any concerns about your proximity to the 17 Bennington landfill? 18 Α. No. 19 As you sit here today, do you have any 20 concerns about your proximity to the 21 Bennington landfill? 22 Α. I have concerns about my proximity to anyplace 23 that's contaminated with PFOA. So I would say 24 that, yeah, I'm -- I'm concerned about being 25 close to PFOA.

Page 38 1 Is it your understanding that the Bennington 2 landfill is contaminated with PFOA? 3 MS. JOSELSON: Objection. If I am recalling conversations about that 4 Α. 5 area, I -- I believe that there is 6 contamination in that region. 7 BY MS. SCHWARZ: 8 When you say conversations -- and again, I Q. 9 don't want to know anything that you would 10 have discussed with your attorneys, but what 11 are you referring to? Conversations with who? 12 It seems like I recall at public meetings Α. 13 maybe some disputes over how certain chemicals 14 got into the landfill. I could be 15 misremembering. So if I am, I's just trying 16 to recollect. 17 Q. Do you recall any other locations in Bennington that are contaminated with PFOA? 18 19 MS. JOSELSON: Objection. 20 I'm sorry, could you say that again? Α. 21 BY MS. SCHWARZ: 22 Q. Sure. 23 To your knowledge, do you know of any 24 other locations that are contaminated with 25 PFOA in Bennington?

Page 39

MS. JOSELSON: Same objection.

- A. So there's a large area of contamination in Bennington, so there is a wide area of contamination. So address by address by address, I wouldn't be able to answer that. But there's a large zone of contamination that's been identified in maps and provided and shown, and it's all over the place around here.
- 10 BY MS. SCHWARZ:

- Q. What's your understanding of zone of contamination?
 - A. My understanding of zone of contamination, that term has been used to designate on a map maybe some demarcations of areas where there has been testing in well water above 20 parts per trillion, and the zone of contamination was then kind of drawn following where it's been found.
 - Q. I'm sorry. I didn't hear that last part. The zone of contamination was what?
 - A. Where PFOA contamination has been found.
 - Q. And when you say contamination, can you just tell me what you mean by that?
 - MS. JOSELSON: Objection.

Page 40 1 Toxic poisoning by PFOA is what I mean by Α. 2 that. BY MS. SCHWARZ: 3 You mentioned that the zone of contamination 4 Q. 5 it's -- you mentioned maps that were handed 6 out. 7 Do you recall that? 8 MS. JOSELSON: Objection. 9 Α. Pardon me? 10 BY MS. SCHWARZ: 11 Do you recall testifying that there were maps 0. 12 that were handed out in connection with the 13 zone of contamination? 14 Α. So I think at public meetings they were on 15 display. I'm trying to remember if they had 16 handouts that also contained them. 17 misspoke, I'm trying to recall if they were 18 just on an overhead and projected, but I 19 believe they -- they're available. So if I 20 say handed out, I don't know if I personally 21 have one. 22 Q. Do you have an understanding of who prepared 23 those maps? 24 Α. I believe they were prepared by Richard 25 Spiese's group that -- the state Department

Page 41 1 of -- I think Environmental Conservation, but 2 I might have their acronym wrong. 3 Richard Spiese is with the Vermont Department Ο. 4 of Environmental Conservation, if you know? 5 I don't -- I don't know. I'm remembering -- I Α. 6 might not be remembering at what company he 7 works for, but, yeah, Richard Spiese, his 8 group. 9 Q. Spiese. Thank you. 10 Α. Yeah. 11 And did Mr. Spiese and his group also tell you 0. 12 that the contamination was toxic poisoning? 13 Α. No. Those are my words that I chose to use. 14 They may have used the word toxins though in 15 presentations. 16 Do you associate toxic poisoning with any 0. 17 particular level of PFOA? 18 Yeah, I think I would. Α. 19 And -- and what level would that be? 0. 20 MS. JOSELSON: Objection. Calls for 21 expert opinion. 22 Α. In -- in my mind being somebody who has it in 23 her body, I would say anything over 24 background, anything over background. 25 BY MR. WILSON:

Page 42 1 What do you understand the background to be? Q. 2 Α. Two point something. 3 And what are you basing that on? 0. What am I basing --4 Α. 5 The background --0. 6 Α. -- the background? 7 Q. Mm-hmm. 8 Α. I believe that was information that was 9 provided at public meetings, and that was the 10 basis, I think, for determining whether you 11 had elevated levels. 12 Public meetings that you -- you mentioned, are Q. 13 those the same as Richard Spiese and his group 14 or different meetings? 15 MS. JOSELSON: Objection. 16 At -- at meetings often there was Α. 17 representatives from the Department of Health, and I believe it was information from the 18 19 Department of Health that was provided that 20 explained background versus elevated levels. 21 And sometimes -- often -- or most often it was 22 the -- the Vermont departments that I 23 mentioned, as well as DOL presenting -- not 24 DOL, Department of Health. 25 BY MS. SCHWARZ:

Page 43 1 You mentioned elevated levels in your blood; 2 is that right? 3 Α. Yes. When did you have your blood tested for PFOA? 4 5 Α. It was June or July of last year, I believe it 6 It may have been May. 7 June or July -- or I'm sorry -- May, June, Q. 8 July of 2016? 9 Α. It was -- I participated with the rounds that 10 Department of Health provided, and I think 11 that they rolled those out last -- I'm not 12 remembering now, I'm sorry, but might have 13 been 2016, summer of 2016. 14 And the meetings that you mentioned, would Ο. 15 those have been after you had your blood 16 tested or --17 MS. JOSELSON: Objection. 18 So the meetings occurred from February of 2016 Α. 19 all the way through the most recent one was a 20 couple months ago, I think. It was at 21 Bennington College, so there's been many. 22 BY MS. SCHWARZ: 23 Ο. Shift gears back to your home. 24 Do you keep a garden at your home at 35 25 Asa's Way?

Page 44 1 Α. Yes. 2 Q. And is it just one? 3 We have four raised beds. Α. 4 Q. And where on the property are the -- are the 5 raised beds? 6 Α. Directionality I'm going to get wrong, but 7 it's just kind of off to the side kind of 8 along our property line -- close to the edge 9 of our property line. 10 Are they all together or spread out across the Q. 11 property? 12 They're four kind of side by side with a Α. 13 little walking path in between them so we can 14 walk in between or mow or whatever. 15 And what do you grow? Q. 16 Α. What do we grow now? 17 0. Yes. 18 It changes slightly year to year. We put in Α. 19 potatoes, and then usually cherry tomatoes, 20 some green peppers, maybe some hot peppers. 21 Ο. And how large are the raised beds? 22 Α. I think they're about four by six. Might be 23 three by five each. 24 Q. And has what you've grown in your garden 25 changed?

Page 45 1 Α. Yes. 2 0. Okay. And how has it changed? MS. JOSELSON: Objection. 3 So I can say that -- going to get emotional. 4 Α. 5 I'm not as into it anymore. BY MS. SCHWARZ: 6 7 Want to take a little break? Q. Α. 8 I'm not -- no, I'm okay. I don't think I'm 9 into gardening anymore because I'm concerned 10 about contaminated soil. I'm not as 11 interested in producing things that we're 12 going to eat. We plant the potatoes because it's fun for the grandkids to dig up. 13 14 I used to take great pleasure in my 15 garden before PFOA. I learned to can. I used 16 to do a lot with zucchinis and vegetables and 17 onions, and I used to have fun doing herbs. 18 It -- it's -- has a different meaning now. So 19 it's changed significantly to me. 20 When did you purchase the raised beds? Q. 21 I think it was in 20 -- I think we might have Α. 22 had one in 2016, and then in 2017 we only used 23 raised beds. 24 And was that because of PFOA? Q. 25 Α. Yes.

Page 46 1 Have you ever had your soil tested for PFOA? Ο. 2 Α. No. And the soil that's now used in raised beds, 3 0. where did that come from? 4 5 I don't recall. We purchased it and brought Α. 6 I'm not sure if Jim, my husband, got 7 it at Home Depot or if we got it from a local gardener, but we brought the soil in. 8 9 Q. And why did you purchase soil to bring in? 10 Because I didn't want to use our soil, our Α. 11 ground soil. Although we did not test our 12 property, soil in the zone of contamination 13 was tested and found to contain PFOA, so we 14 brought in new soil. 15 What's your understanding that there has been Q. 16 soil testing in the zone of contamination that 17 resulted in elevated PFOA levels? 18 MS. JOSELSON: Objection. 19 Α. Can you repeat the question? 20 BY MS. SCHWARZ: Is -- is it your understanding that the 21 Ο. 22 soil was tested within the zone of 23 contamination and showed PFOA? 24 Α. Yes. The -- yes.

What's your basis for that belief?

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Page 47

- A. We were presented with that information at a town meeting. There's PFOA in the soil.
 - Q. And where in the zone of contamination was there PFOA detected in the soil?

MS. JOSELSON: Objection.

- A. I would need to refer to documents that were presented to us that I don't know where they took samples, but samples were taken. It was tested and found to have PFOA, including going up to White Rocks. And there was studies done by Bennington College, and that was presented to us at a meeting.
- BY MS. SCHWARZ:
- 14 Q. Why didn't you test your ground soil for PFOA?
- 15 A. I don't have the financial resources to do it.
- Q. Have you researched how much it cost to do that?
- 18 A. No.

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- Q. You testified that your husband purchased the soil that's currently in the raised beds; is that correct?
- 22 A. Yes.
- Q. But you know -- you still don't plant your vegetables; is that -- am I getting that accurate?

Page 48 1 Objection. MS. JOSELSON: 2 Α. I plant some vegetables. BY MS. SCHWARZ: 3 Okay. And why don't you plant what you used 4 Q. 5 to? 6 Α. Because it's not as fun anymore. 7 Q. Are you concerned about PFOA being in the 8 soil? 9 Α. I'm -- I'm not concerned about PFOA being in 10 the soil that we've purchased. I just don't 11 enjoy my garden the way I used to. So I don't 12 do it as much. 13 Why don't you enjoy it the way you used to? Q. 14 I'm not -- why don't I enjoy it the way I used Α. 15 I think ultimately when I garden it just 16 reminds me that we've been contaminated. 17 quess I -- maybe it's -- maybe it's a feeling, 18 I don't know. I don't know how to answer 19 that. 20 How often do you water your garden? Q. 21 We water the garden probably once a day. Α. 22 Q. I assume not in the winter; is that --23 We -- no, we don't have a garden in the Α. 24 winter. 25 Q. So about how many months out of the year would

Page 49 1 you water the garden? 2 Α. We have a garden June through August-ish, and 3 we probably don't water it as much when it starts to fizzle away. 4 5 So currently where does the water come from Q. 6 that you water the garden? 7 We have a hose, and we have the POET system, Α. 8 so it's filtered water. 9 Ο. Prior to the detection of PFOA in well water, 10 where did that water come from? 11 MS. JOSELSON: Objection. 12 Α. Say that again. I'm sorry. 13 BY MS. SCHWARZ: 14 Where did -- did that change at all as 0. far as the source of the water that you would 15 16 use to water your garden? 17 MS. JOSELSON: Objection. 18 So we didn't have a POET system before the Α. 19 contamination, so we'd use the hose to water 20 the garden. 21 MS. JOSELSON: I'd like to take breaks 22 every hour, so you just decide when it's a 23 good time. 24 MS. SCHWARZ: This is -- this is fine. 25 We can take a quick break.

Page 50 1 THE VIDEOGRAPHER: The time is now 2 approximately 10:28 a.m. Going off the 3 record. (Brief recess taken.) 4 5 THE VIDEOGRAPHER: The time is now 6 approximately 10:41 a.m. Going back on the 7 record. BY MS. SCHWARZ: 8 9 Q. Miss Addison, are you ready to continue? 10 Α. Yes. 11 I apologize. I may have overlooked this at Q. 12 the beginning, but if you ever need a break, 13 just let me know. This is not meant to be a 14 test of endurance at all. So if you need one 15 just -- just let us know. Okay? 16 Α. Okay. 17 Q. All right. We were talking about your garden before we took a break. 18 19 What would it take for you to feel 20 comfortable using your garden again? 21 Α. Probably not being on that property. 22 Q. I'm sorry. Did you start to say something? 23 I started to but I'm not. Α. 24 Q. Have you considered selling your property? 25 Not at this time. Α.

Page 51 1 Have you considered selling it at a later Q. 2 date? 3 Α. There's a possibility that when we retire, we may want to downsize. 4 5 Have you considered selling your property Q. 6 because of the PFOA that was detected in your 7 well water? 8 I don't consider that a possibility at this Α. 9 time. 10 Why is that? Q. 11 Because there's no hookup to clean water yet. Α. 12 What do you mean by clean water? Q. 13 Α. Municipal water. 14 You currently have a POET installed; is that 0. 15 correct? 16 Α. Yes. 17 And do you believe the POET is effective in Q. 18 filtering out any PFOA --19 MS. JOSELSON: Objection. 20 BY MS. SCHWARZ: 21 -- in your well water? Ο. 22 Α. I'm not confident with the POET system. 23 know it gets tested. 24 Q. You've consented to being hooked up to 25 municipal water; is that correct?

Page 52 1 Α. Yes. 2 Q. Do you have any sense of when that will 3 happen? I do not know exactly. 4 Α. 5 Have any of your neighbors, to your knowledge, 0. 6 been hooked up to municipal water? 7 I don't know. Α. 8 Ο. Have you discussed the PFOA detection or PFOA in general with any of your neighbors? 9 10 Have I --Α. 11 MS. JOSELSON: Objection. 12 Have I discussed PFOA in general with my Α. 13 neighbors? 14 BY MS. SCHWARZ: 15 Q. Yes. 16 Α. Yes. What were -- what neighbors did you discuss 17 Q. 18 PFOA with? 19 There's a couple of neighbors on Susan Taylor Α. 20 Lane and a couple of neighbors down the road 21 that I've had conversations with. 22 And who did you speak with on Susan Taylor Q. 23 Lane? 24 The Camelios, Kobiks, Sandy and Marie-Pierre. Α. 25 Are those the Sumners? Ο.

Page 53 1 Α. Yes. 2 Q. How about -- I'm sorry, I missed -- what --3 what road did you mention? Susan Taylor Lane. 4 Α. 5 Ο. And --6 Α. And down my -- my own road. 7 Q. Oh, on Asa Way? Α. 8 On Asa's Way. 9 And what neighbors on Asa's Way did Q. 10 you discuss PFOA with? 11 I think the Joneses were at a meeting at the Α. 12 Camelios' house that we had. They actually 13 might be on Royal Street. And then another 14 neighbor down from them. 15 And in general what was the nature of your Q. 16 discussions about PFOA? 17 Α. Maybe just sharing information about when 18 meetings were, what we were going to do to try 19 to remediate the situation, maybe sharing 20 information that people might have, you know, 21 gotten at a public meeting about the subject. 22 Did I understand you correctly is it your Q. 23 understanding you don't believe you can sell 24 your home until it's connected to municipal 25 water?

		Page 54
1	A.	Yeah.
2		MS. JOSELSON: Objection.
3		BY MS. SCHWARZ:
4	Q.	So you've discussed selling your home with
5		your husband?
6	Α.	No, that's not what I said.
7	Q.	I apologize.
8	A.	That's all right.
9	Q.	I didn't mean to suggest that.
10		Did you have you had any discussions
11		with your husband about selling your home?
12	A.	No. We well, we don't have plans to sell
13		the home, so that's kind of a moot point.
14	Q.	And is the reason that you don't have plans to
15		sell your home because it's not connected to
16		municipal water?
17		MS. JOSELSON: Objection.
18	A.	We don't plan on selling the home right now
19		because we're living there now. We wouldn't
20		probably want to sell the house until we
21		retire-ish, but just not under the radar.
22		BY MS. SCHWARZ:
23	Q.	You talked about your gardening.
24		Do you do you entertain in your home?
25	Α.	Not often.

Page 55 1 Approximately how often would you say? Q. 2 Α. Maybe when the family visits. 3 Your children? Ο. So -- yeah, my children. 4 Α. 5 And I believe you said your son visits once 0. 6 a -- once a year; is that --7 Α. Approximately. 8 Do you otherwise entertain at your home? Q. 9 Α. Not often. 10 When you do, is it indoor? Q. 11 It would probably depend on the time of year. Α. 12 So if it's winter, it'd be indoor. 13 Q. Do you ever work from home? 14 Very rarely. Α. 15 Q. Do you have a home office? 16 Α. No. 17 When -- when you do work from home, where --Q. 18 where do you work, in the house that is? 19 Α. I might sit at the kitchen table with my 20 laptop. 21 Q. Do you have a -- a yard, a backyard in your 22 home? 23 Α. Yes. 24 And do you -- how do you use the backyard in Q. 25 general, if at all?

Page 56 1 Objection. MS. JOSELSON: 2 Α. I hang laundry outside. BY MS. SCHWARZ: 3 On a clothesline? 4 Q. 5 Α. We have a clothesline. I have a chair. I sit 6 outside in nice weather. We have dogs. Take 7 the dogs outside. Do you have a -- a dog run? 8 Q. 9 Α. No. 10 Q. Backyard have grass or --11 Α. Yes. 12 Okay. How about do you have a front yard? Q. 13 Α. Sort of. It's built on a hill. It's more 14 driveway in front of the house, and then on 15 the side there's some, so I don't really 16 consider it like a front yard, per se. It's 17 kind of a slope that comes down. 18 And on the sides is it grassy? Q. 19 Yes. Α. 20 Q. Miss Addison, when did you first hear about 21 PFOA? 22 Α. I think it was in February of 2016. 23 And what did you hear about it? 0. 24 That PFOA had been detected in well water. Α. 25 Q. When you say well water, are you referring to

Page 57 1 your own well water, or is it general? 2 Α. Well water in certain homes near the old 3 ChemFab building. When you say the old ChemFab building, what --4 Q. 5 what location are you referring to? 6 Α. The one in North Bennington. 7 And in February of 2016, did you learn that Q. 8 your well water had PFOA? 9 Α. No. 10 What was the context of how you heard about it Q. 11 in February of 2016? 12 MS. JOSELSON: Objection. 13 Α. There was a public meeting at the firehouse, 14 and it was announced by legislators or 15 representatives. Department of Environmental 16 Conservation had that meeting. 17 BY MS. SCHWARZ: 18 And did you take any action based on what you Q. 19 learned in February of 2016 at that meeting? 20 Sure. Α. 21 Ο. And what did you do? 22 Α. Stopped -- what actions? I tried to get as --23 information. I attended the meetings that 24 were available and followed the 25 recommendations.

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- Q. And whose recommendations were you following?
 - A. Those who presented at that meeting. I think it was the Environmental Conservation people.
 - Q. And what recommendations did they offer?
 - A. To drink the -- the potable water that they were bringing in, and they set up sites to do that.
 - Q. Would you elaborate a bit more on -- on the water they were bringing in?
 - A. So I think at the time they advised to, if you were on a well, to drink bottled water or to bring containers to the big tanks that they had set up, and they started supplying water.
 - Q. Did you bring containers to the wells -- I'm sorry -- did you bring containers to the tanks they had set up?
 - A. We -- no. We went to -- there was a couple markets that had water you could go and get.
- Q. So you would pick up bottled water on, was it on a weekly basis?
 - A. No, it was probably more often than that.
 - Q. And was -- was it you that primarily picked up the bottled water or your husband or a combination?
 - A. Both of us.

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Page 59 1 And what market did you pick up the water 2 from? 3 Α. There was a market on -- in North Bennington, Bennington Variety. I don't remember the name 4 5 of it. It might have been North Bennington 6 Variety. 7 Do you drink bottled water today? Q. 8 Α. Yes. 9 And are you purchasing it or --Q. 10 Α. It's delivered to us. 11 And when did you set up the deliveries of the 0. 12 bottled water? 13 Α. We didn't set it up. It was set up by the 14 state. We just had to call and -- so as soon 15 as it was available to us to be -- to be 16 delivered, we called. 17 And after the -- the POET was installed in Q. 18 your home, you continued to drink bottled 19 water? 20 Yes. Α. 21 Ο. Why was that? 22 Α. We were not confident with the POET system. 23 There was originally arsenic in the filtering 24 systems, which was concerning to us. The E.

coli unit that -- there was a -- a vacuum

Page 60 1 tube -- there was some kind of tube that 2 corrects potential E. coli that broke, so we 3 weren't confident that the system was failproof, so we drink bottled water. 4 5 Prior to installation of the POET on your Q. 6 property, had you tested your well for E. 7 coli? 8 We had whatever testing was needed to move in Α. with a well. I don't know. 9 10 What was the nature of the testing that was Q. 11 needed to move in? 12 I don't know. We --Α. 13 Q. And that would have been done in approximately 2008? 14 If -- if there were tests. I'm assuming there 15 Α. 16 was a well water test to move in, but I don't 17 really know. 18 And prior to the POET being installed on your Q. 19 property, did you -- have you tested your well 20 water for arsenic? 21 Α. No. 22 To your knowledge, have you tested your well Q. 23 water at all between 2008 and today? 24 Have we tested our well water? Α. 25 0. Yes.

Page 61 1 Or has the state? Α. 2 Q. Have you. 3 Α. Have we ourselves? No. We get the results. And prior to PFOA being detected in your well 4 Q. 5 water, had you tested it? I don't know. 6 Α. 7 When did you learn that there was PFOA Q. 8 detected in your well water? 9 Α. I think we got our results March. 10 March of 2016? Q. 11 Α. Of 2016. 12 And when did you have your blood tested for Q. 13 PFOA? 14 Α. I think earlier when we spoke about that. Ιt 15 was when they offered those first rounds. Ι 16 think it was May or June. 17 Q. And who performed that blood test? 18 Α. Department of Health. 19 Do you recall receiving your results? Q. 20 I do. Α. 21 Ο. Do you recall what the results were? 22 Α. Yes. 23 0. And what were they? 24 Α. My level at the time was 40.9. 25 Q. 40.9 parts per trillion?

		Page 62
1	A.	Yes.
2		MS. JOSELSON: Objection.
3		BY MS. SCHWARZ:
4	Q.	And what, if anything, were you told about
5		your results when you received them?
6	A.	I believe I recall a letter coming with it.
7		MR. SILVER: Can I ask you just to
8		clarify? When you were asking the results
9		parts per trillion, were you talking about
10		blood levels or were you
11		MS. SCHWARZ: Oh, yeah.
12		MS. SILVER: talking about
13		MS. SCHWARZ: The her serum levels.
14		MS. JOSELSON: Yes, it's not tested in
15		parts per trillion.
16		MS. SCHWARZ: Did I yeah, did I say
17		MR. SILVER: It's micrograms
18		MS. SCHWARZ: Yes.
19		MS. SILVER: per liter, I believe.
20		MS. SCHWARZ: Right, which is parts
21		per billion.
22		BY MS. SCHWARZ:
23	Q.	Miss Addison, when you received your results,
24		you said you testified there was a letter that
25		accompanied them; is that right?

Page 63 1 I believe there was. Α. 2 Q. And what did that letter say? 3 I don't recall. Α. Did it provide any information with respect to 4 Q. 5 what your results mean? I believe it did. 6 Α. 7 Do you have any recollection of -- of what Q. 8 that was? 9 Α. I'm sorry? 10 Do you have any recollection of what it did Q. 11 say about your results and what they meant? 12 It meant that it was elevated. Α. 13 (Deposition Exhibit No. 1 was marked for 14 identification.) 15 Miss Addison, the court reporter is handing Q. 16 you what's been marked as Exhibit 1, to your 17 Take a moment to look at the deposition. 18 document. Let me know if you recognize it. 19 Α. (Witness complying) Yes. 20 What do you recognize it to be? Q. 21 Declaration of me in support of plaintiffs' Α. 22 motion for a class certification. 23 Q. Did you prepare this document? 24 Α. This document was prepared by my attorneys on 25 my behalf.

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- Q. Did you review the information in it to make sure it was accurate?
- A. I did.

- Q. And is that your signature at the bottom of page 3?
 - A. Yes.
 - Q. And if I may ask you to turn to page 2, paragraph 6. And it says there: As a result of the elevated levels of PFOA in my blood serum, I am concerned about my increased risk of developing medical conditions and/or diseases associated with PFOA exposure and seek the establishment of a medical monitoring fund to pay for the necessary testing and early detection of such conditions for myself and all those in Bennington and North Bennington exposed to PFOA by drinking well water contaminated with PFOA.

Did I read that correctly?

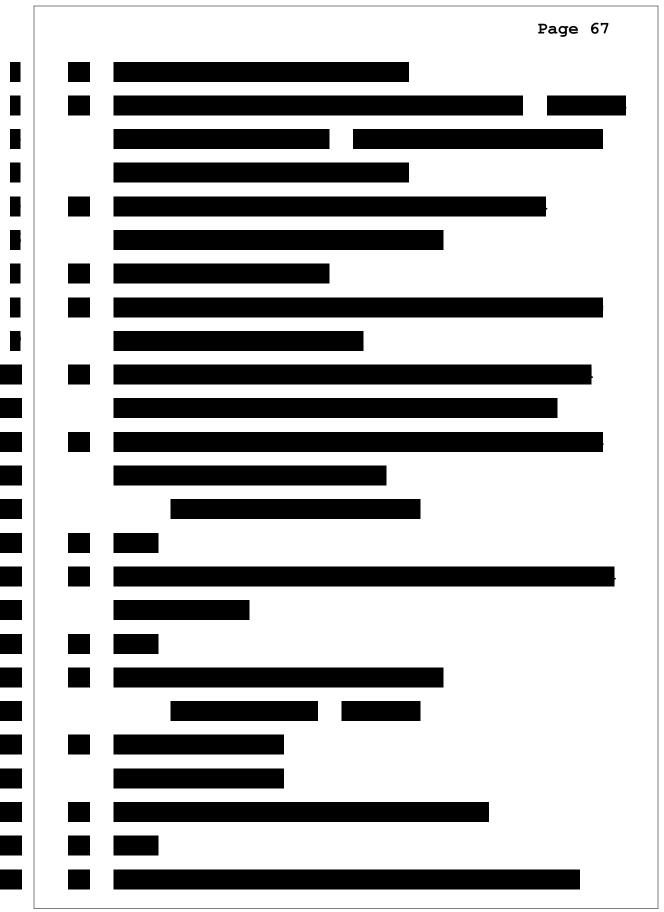
- A. Yes.
 - Q. What is your understanding of the medical conditions or diseases associated with PFOA?
 - A. My understanding is that PFOA can have a bad impact on one's body in multiple areas of concern.

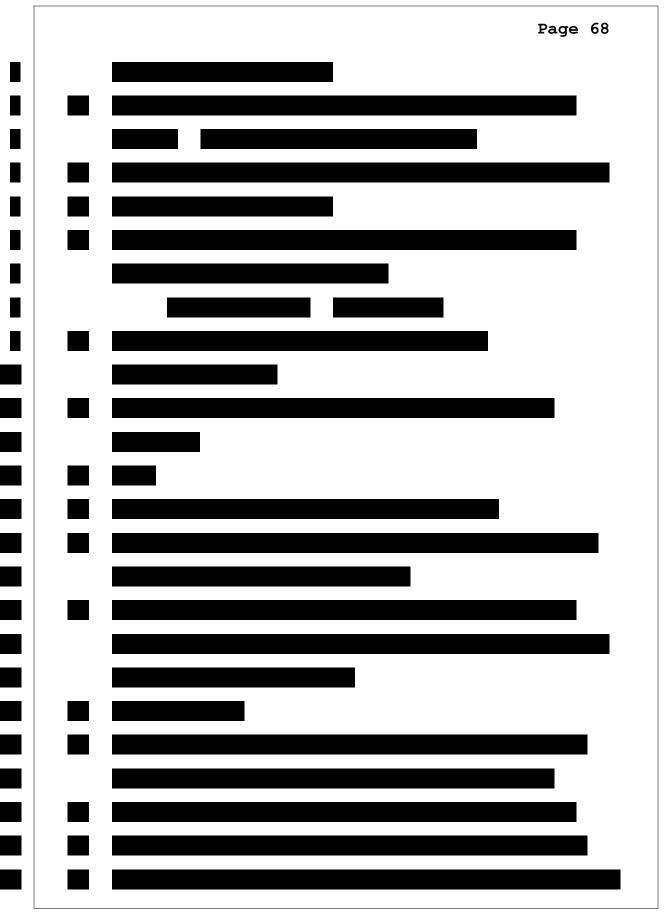
Page 65 1 Can you elaborate on a bad impact? Ο. Α. 2 It can lead to high cholesterol, from what I'm 3 gathering, testicular cancer, issues with liver, bladder, kidney I believe. It might be 4 5 something with low birth weight babies, and I'm sure there's others that I'm not 6 7 remembering, but those are the ones that stand 8 out to me. 9 Q. And what are you basing that on? 10 Α. Which part? I'm sorry. 11 What's your basis for believing that it leads 0. 12 to high cholesterol, or problems with your 13 liver, bladder, kidney or any other organs? 14 Α. From information that I've been provided. 15 Q. And who provided that information to you? 16 I believe it was the Department of Health. Α. Was the information in the form of studies? 17 0. 18 I can't recall exactly. I can't recall it Α. 19 exactly. 20 Have you done any independent research? Q. 21 I've read some studies. Α. 22 And were those studies provided to you or --Q. 23 or did you find them on your own? 24 I found them. Α.

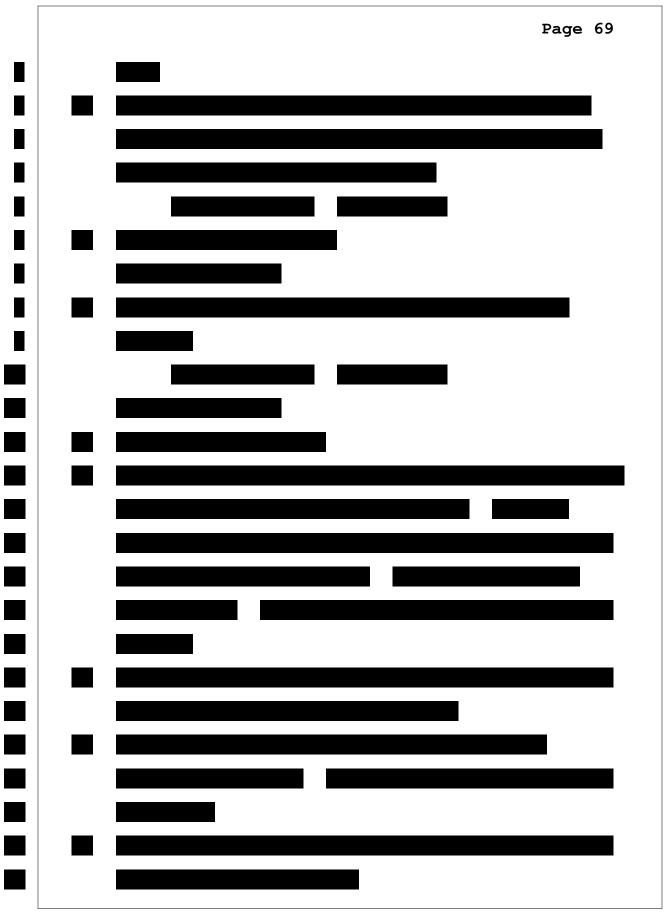
How did you find those studies?

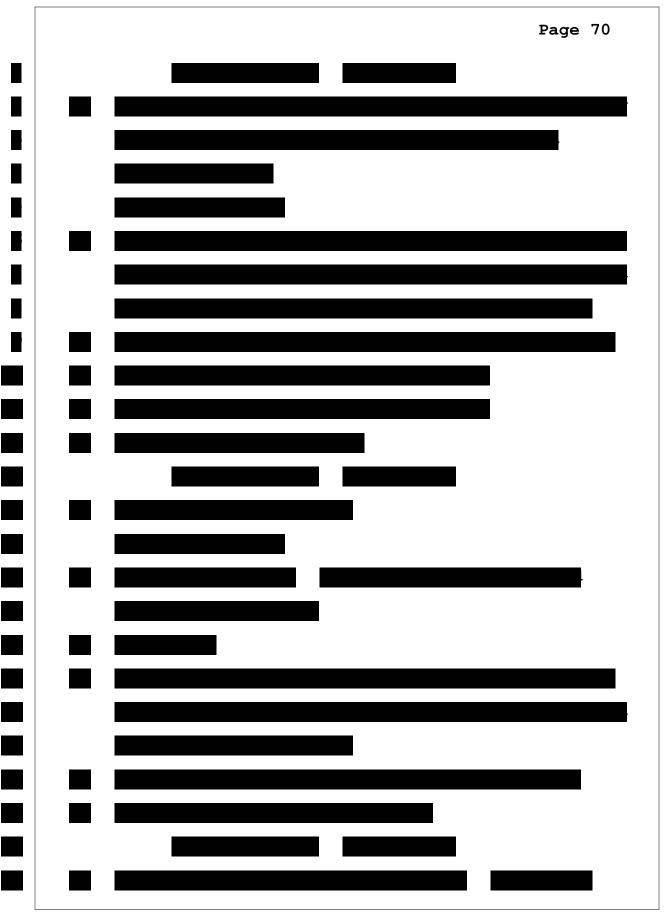
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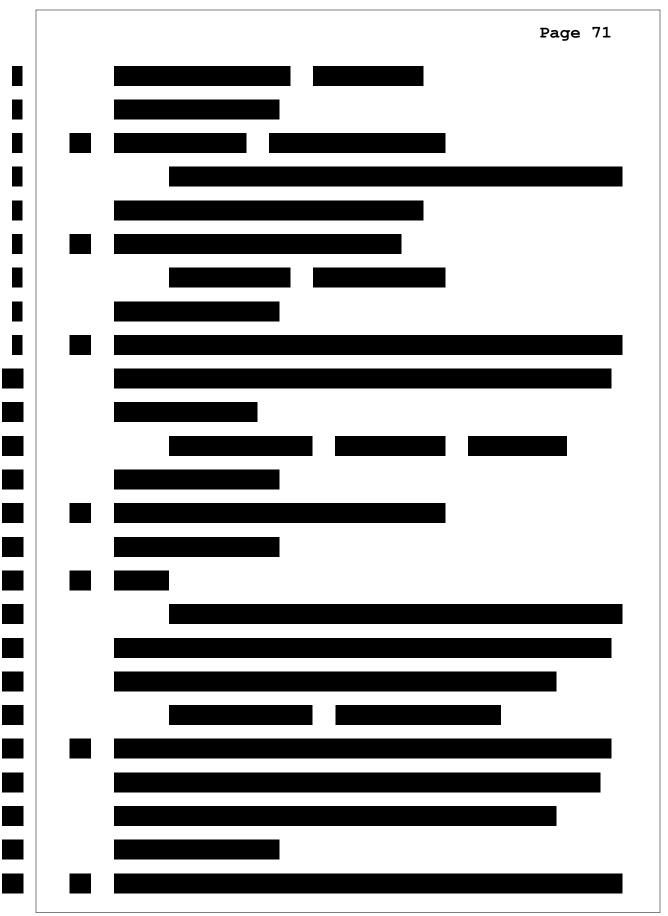
		Page 66
1	A.	Searching the internet.
2	Q.	Do you recall the name of any of those
3		studies?
4	A.	I I reviewed the the big C8 study. I
5		might have the name wrong, but the one in the
6		Ohio Valley area.
7	Q.	Any others?
8	A.	Not that I can recall.











Page 72 7 BY MS. SCHWARZ: 8 Okay. If we could turn back to your Q. 9 declaration. 10 Do you understand yourself to be 11 representing the exposure class in this 12 litigation? 13 Α. Yes. 14 And what do you understand that to mean? 15 I'm a member of the class with elevated levels Α. 16 of exposure in my blood based on the testing, 17 and that is similar to other people who have been similarly impacted by PFOA exposure. 18 19 You testified that you -- you're a member of Q. 20 the class -- of the exposure class; is that 21 correct? 22 Α. Yes. 23 Do you understand yourself to be representing 0. 24 the exposure class? 25 Α. Yes.

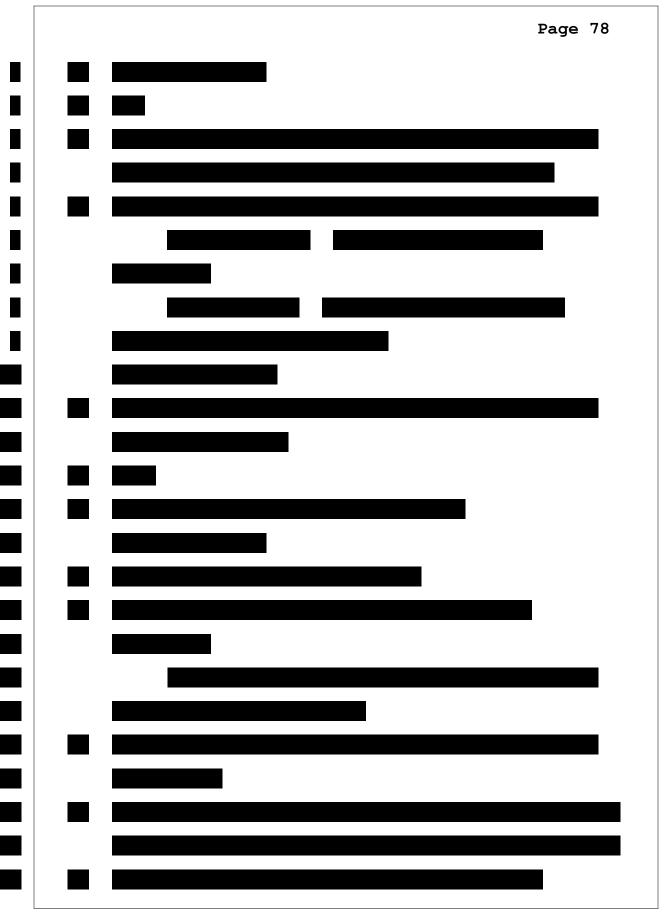
Page 73 1 Do you have an understanding as to whether you 2 have additional responsibilities as a class 3 representative of the exposure class? Α. Yes. 4 5 And what -- what's the nature of those 0. 6 responsibilities that you have? 7 MS. JOSELSON: Objection. 8 Things like I'm doing today, things like the Α. 9 documents that we've produced, responding to 10 your requests. 11 BY MS. SCHWARZ: 12 Do you understand yourself to be representing Q. 13 the property damage class in this action? 14 Yes. Α. 15 Q. And what do you understand property damage 16 class to mean? 17 Α. I understand that to mean people who have been 18 similarly impacted by PFOA exposure to our 19 community in the zone of contamination. 20 If we could unpack that a bit. Q. 21 What do you remember by people that have 22 been similarly impacted in the zone of 23 contamination? 24 MS. JOSELSON: Objection. 25 Α. I mean that to mean that I live in a community

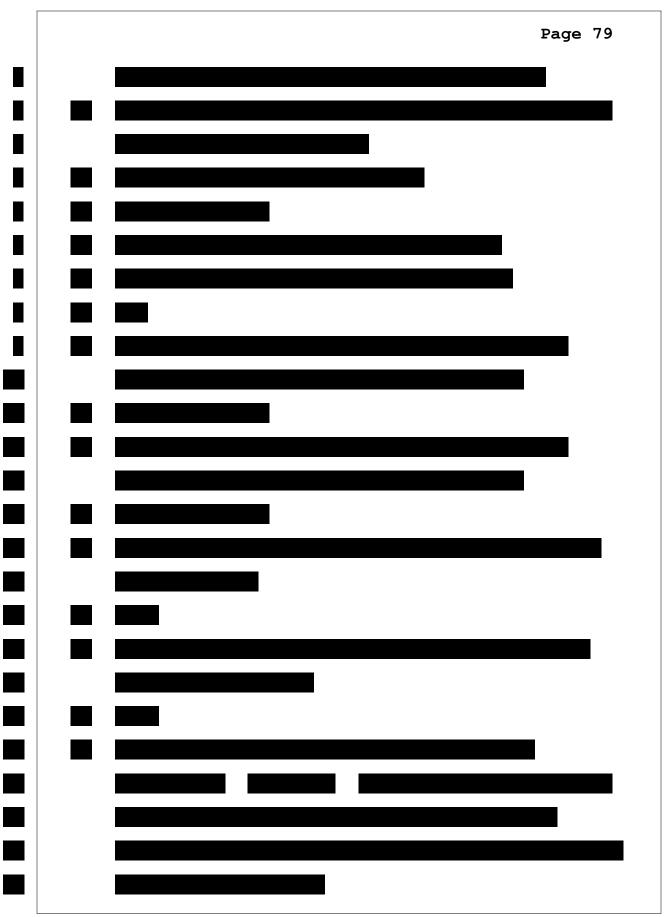
Page 74 1 that has been exposed to PFOA, directly, 2 indirectly, in your property, your neighbors' 3 property. BY MS. SCHWARZ: 4 5 And when you say community, are you talking Q. 6 about North Bennington or the North Village or 7 something else -- something else? 8 I mean the zone of contamination, our Α. 9 community. I guess I'm using that word 10 specifically and broadly. 11 What's your understanding of the boundaries of 0. 12 the zone of contamination? 13 MS. JOSELSON: Objection. Asked and 14 answered. You can answer it again. 15 Α. Could you ask me again? I'm sorry. 16 BY MS. SCHWARZ: Sure. What's your understanding of the 17 Q. boundaries of the zone of contamination? 18 19 Α. I'm not able to answer that specifically, 20 because I don't know if that's a legal term 21 that you're using or if it's a term in the 22 case; but I can refer to a map, and I see 23 lines that are drawn and -- so I -- there's 24 some boundaries on it. 25 Q. And is it your understanding that you're

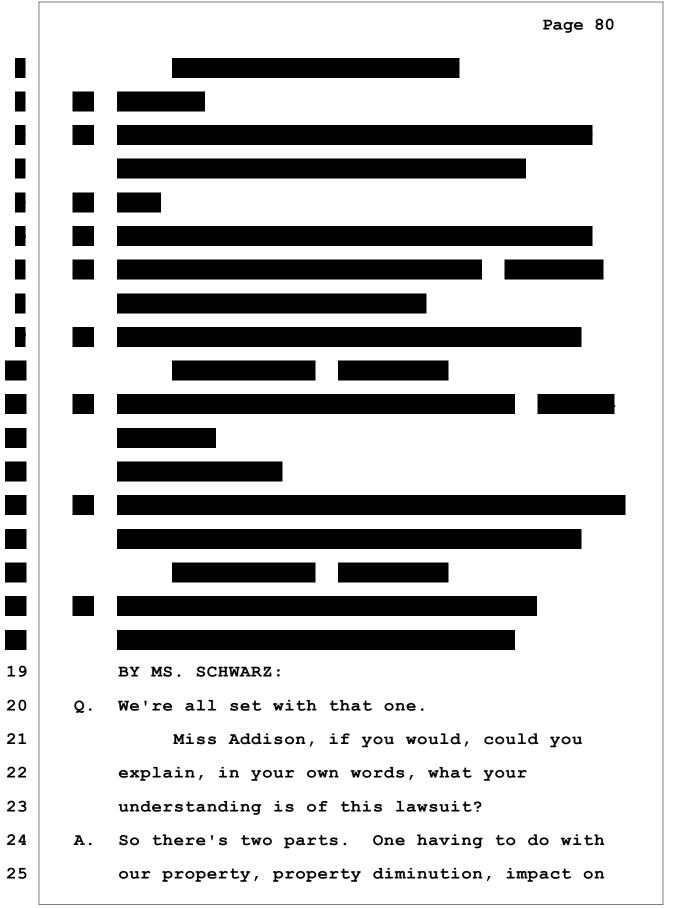
Page 75 1 representing anyone within the zone of 2 contamination, as you understand that term? 3 MS. JOSELSON: Objection. Yes. Α. 4 5 (Deposition Exhibit No. 2 was marked for 6 identification.) 7 Miss Addison, you've been handed what's been Q. 8 marked as Exhibit 2 to your deposition. a moment and let me know if you recognize that 9 10 document. 11 I recognize the document. Α. 12 What do you recognize it to be? Q. 13 Α. This is my written notes from a testimony that 14 I provided to the Vermont Senate of Natural 15 Resource and Energy Committee when they 16 visited Bennington College. 17 Q. Did you prepare this testimony? I did. 18 Α. 19 Did anyone help you to prepare the testimony? Q. 20 Α. No. 21 Ο. If I could point you to the second paragraph. 22 It says, almost one year ago I was presented 23 with the realization that my property and my 24 beautiful home were forever changed. 25 absolutely heartbroken.

		Page 76
1		Did I read that correctly?
2	A.	Yes.
3	Q.	I learned that PFOA is in my well and in my
4		drinking water. This was soon followed by
5		learning that PFOA is in my body and that of
6		my spouse and my children.
7		Did I read that correctly?
8	Α.	You did.









Page 81 1 our community, loss of property value, loss of 2 enjoyment and use. And then the other part is 3 to receive medical monitoring. What do you understand the term medical 4 Q. 5 monitoring to mean? 6 Α. So medical monitoring would be a comprehensive 7 and intentional protocol for people who have 8 PFOA exposure above background level who are 9 within the zone of contamination to receive 10 annual specific testing by practitioners who 11 are specifically trained in chemical exposure 12 so that we can be medically monitored for, I 13 believe, up to 30 years. 14 And what's your basis for that understanding? Ο. 15 Α. The explanation that was provided to me by my 16 attorneys. 17 Q. To your knowledge, are the ultrasounds and 18 blood tests that you had that were -- that 19 were ordered by Dr. Wood part of this medical 20 monitoring that you discussed? 21 Α. No. 22 MS. JOSELSON: Objection. 23 BY MS. SCHWARZ: 24 Q. And why not? 25 Α. There's not a medical monitoring system set up

Page 82 1 She -- so it would not be part of the 2 medical monitoring. 3 And what's -- what's your understanding of Ο. 4 what the lawsuit is alleging that Saint-Gobain 5 did wrong? Saint-Gobain released a toxic chemical into an 6 Α. 7 environment in such a way that it is in my 8 body, my yard, my community, my neighbors' yards, our children. 9 10 And what's your basis for that understanding? Q. 11 Α. What's -- I'm sorry. I'm confused with the 12 question. 13 Q. Sure. What -- what are you basing that on? 14 I have PFOA in my body. Α. 15 Q. And I apologize I wasn't specific enough. 16 What are you basing Saint-Gobain's 17 conduct on? Did you read about it somewhere? 18 Did you discuss it? 19 MS. JOSELSON: Objection. 20 I'm sorry --Α. BY MS. SCHWARZ: 21 22 Q. So let me rephrase. 23 Α. Yeah. 24 Q. Sure. 25 Α. Okay.

Page 83 1 How did you come to form the belief that 2 Saint-Gobain released, I believe you 3 testified, a toxic chemical? From meetings that I've attended. That's what 4 Α. 5 I've learned. 6 0. So what -- what meetings specifically are you 7 referring to that you've attended that said 8 that Saint-Gobain released a toxic chemical 9 into the environment? 10 MS. JOSELSON: Asked and answered. You 11 can answer it again. 12 THE WITNESS: I didn't hear what you 13 said. I'm sorry. 14 MS. JOSELSON: I said asked and answered, 15 but you can answer it again if you understand 16 it. 17 Α. So meetings that were provided by the 18 Department of Environmental Conservation, as 19 well as community college or at the Bennington 20 College. 21 BY MS. SCHWARZ: 22 And at these meetings, you learned or you were Q. 23 told that Saint-Gobain released a toxic 24 chemical into the environment; is that

correct?

Page 84 1 That PFOA was released into the environment. Α. 2 Q. Okay. How did you come to form the belief that Saint-Gobain released PFOA into the 3 environment? 4 5 MS. JOSELSON: Objection. 6 Α. From my understanding of the ownership of the 7 plant. 8 BY MS. SCHWARZ: 9 What are you relying on for your understanding Q. 10 of the ownership of the plant? 11 Based on what I've read, what I've gathered at Α. 12 public meetings. 13 Q. What did you read? 14 That ChemFab produced a product that was Α. released. 15 16 And I'm sorry, what -- and when you say that Q. 17 you've read it, are you referring to media articles? 18 19 I don't recall exactly. Α. 20 Q. Would it be a newspaper? 21 Α. I would say public meetings mostly. 22 Q. The reading material you mentioned, is that 23 from anything that was handed out at these 24 public meetings? I don't recall exactly. 25 Α.

- Q. And what's your understanding of the relief that you're seeking in this case?
- A. My understanding is that there has been diminished property value, negative impact on use of our homes and properties and then monetary resources to provide the medical monitoring.
- Q. Focusing on the -- the property, the diminished property value and the negative impact, what's the -- what's the relief that you're asking for to address both of those issues?
- A. When you say relief, are you -- I'm not sure what you're asking when you say relief.
- Q. Sure. Are you seeking compensation in some form? Are you seeking some -- what's the recourse that you're asking the Court to provide in this case with respect to the property damage?
- A. Yes. It would be monetary to be made whole again.
- Q. And what would it take for you to be made whole again?
- MS. JOSELSON: Objection. Calls for a legal conclusion.

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Page 86 1 You can answer it, if you understand it. 2 I'm not able to answer that. BY MS. SCHWARZ: 3 Do you have any understanding of what you're 4 Q. 5 asking the court to provide by way of --6 Α. Being made whole again? 7 Yeah. Q. 8 Α. Can you ask the question differently because 9 I'm -- I'm trying to formulate my thoughts, 10 but I'm not exactly sure what you're looking 11 for? 12 So you testified that there were two Sure. Q. 13 parts as far as your understanding goes to the 14 lawsuit, correct? 15 Α. Yes. 16 And we've talked about the medical monitoring 0. 17 portion? Mm-hmm. Mm-hmm. 18 Α. 19 And you're seeking a medical monitoring fund, Q. 20 correct? 21 Mm-hmm. Α. 22 And then the other part is diminished property Q. 23 values and negative impact; is that correct? 24 Α. Mm-hmm, yes. And I don't think we've discussed, and that's 25 0.

Page 87 1 what I'm trying to find out, is what exactly 2 you're seeking from the court to address the diminished property value and negative impact. 3 MS. JOSELSON: Same objection. 4 5 You can answer. 6 Α. I feel as though I have been unfairly 7 assaulted with a chemical that I didn't ask to 8 have in my yard, my body, our properties. 9 It's impacted my home value; it's impacted my 10 quality of life; it may impact my future in a 11 significant way. So I am hoping to be made 12 whole. 13 BY MS. SCHWARZ: 14 To be made whole, would that -- would that be 0. 15 monetary compensation? 16 I believe so, in addition to medical Α. 17 monitoring. 18 And I believe you mentioned that you --Q. 19 your -- you believe you were unfairly 20 assaulted with a chemical in your yard and 21 your body; is that accurate? 22 MS. JOSELSON: Objection. 23 Are you asking me if that's what I said? Α. 24 BY MS. SCHWARZ: 25 Did I write that down --0.

		Page 88
1	A.	I believe that's what I said.
2	Q.	Okay. And what did you mean with respect to
3		your yard?
4	A.	My groundwater is no longer usable.
5	Q.	Okay. So you're referring to your well?
6	A.	It no, that's not what I said.
7	Q.	Okay.
8	A.	It's not just my well. It's my groundwater.
9		It's my soil, my property and my use and
10		enjoyment of that.
11	Q.	You testified earlier you've never tested the
12		soil on your property; is that correct?
13		MS. JOSELSON: Objection. Asked and
14		answered.
15	A.	Correct.
16		MS. SCHWARZ: Good time for a break?
17		MS. JOSELSON: Sure.
18		(Off-the-record colloquy.)
19		THE VIDEOGRAPHER: The time is now 11
20		(Off-the-record colloquy.)
21		THE VIDEOGRAPHER: The time is now
22		approximately 11:31 a.m. Going off the
23		record.
24		(Brief recess taken.)
25		THE VIDEOGRAPHER: The time is now

Page 89 1 approximately 11:40 a.m. Going back on the 2 record. BY MS. SCHWARZ: 3 Miss Addison, are you ready to continue? 4 Q. 5 Α. Yes. We're going to mark Exhibit 3 to your 6 Ο. 7 deposition. 8 (Deposition Exhibit No. 3 was marked for 9 identification.) 10 Miss Addison, you've been handed Exhibit 3 to 11 your deposition. 12 You can take a moment and let me know if 13 you recognize it. 14 Yeah. Α. 15 Q. What do you recognize it to be? 16 Α. Third Amended Complaint Class Action Jury 17 Trial Demand document. 18 Have you seen this document before? Q. 19 Yes. Α. 20 If you could turn to paragraph 5 on page 3? Q. 21 Α. (Witness complying) 22 Q. That last sentence there states: As a result 23 of the contamination of their private drinking 24 well water, groundwater and soil, Mr. Sullivan 25 and Ms. Addison have suffered, amongst other

Page 90 1 damages set out herein, diminution in property 2 value, loss of use and enjoyment of property, 3 annoyance, upset, aggravation, and inconvenience. 4 5 Did I read that correctly? 6 Α. Yes. 7 Q. Do you agree with that statement? 8 Α. I do. 9 And we'll get into the diminution in property Q. 10 value claims a bit later, but can you tell me 11 generally describe how your property value has 12 been diminished? 13 MS. JOSELSON: Objection. 14 Α. I currently have to drink bottled water to feel confident that I'm drinking clean water. 15 16 My groundwater has been contaminated. 17 no longer use the well on my property. Our --18 the soil's contaminated. My POET system has 19 failed as far as the UV thing breaking, so I 20 don't have confidence in that. 21 BY MS. SCHWARZ: 22 Anything else? Q. 23 Yeah. I feel like because of this Α. 24 contamination, which has been widely 25 publicized, our community has been

Page 91 1 stigmatized, which is also impacting on my 2 property value. 3 You testified that your -- your POET failed. Ο. 4 Is it your understanding that the POET 5 currently is not in working order? 6 Α. What I -- to clarify what I said, the UV 7 component broke a couple months into using it, 8 and I don't know whether that caused us to 9 have E. coli contamination as -- when that --10 during the period that that wasn't working. 11 That's what I meant. 12 And was -- was it fixed, to your knowledge? Q. 13 Α. It was fixed. 14 And who fixed it? 0. 15 I don't recall. Α. 16 Was it you or your husband? 0. 17 No, we didn't fix it. The people who handle Α. 18 the POET systems fix it. 19 You mentioned E. coli contamination as a Q. 20 potential concern when the UV light was not 21 working; is that correct? 22 Α. I don't know how the equipment works. I just 23 know that it was removed -- a part of it was 24 removed. 25 And the --Q.

- A. The part -- when the part needed to be replaced, it wasn't there. So therefore the system was not working the way it should have been.
- Q. And prior to having a POET installed on your property, were you filtering out the E. coli that could potentially be in your water?

 MS. JOSELSON: Objection.
- A. My understanding is that they have the -- the

 E. coli is part of the POET system to

 counteract some of the filtration system

 that's in the POET itself.

BY MS. SCHWARZ:

Q. You never tested your well water previously for E. coli, right?

MS. JOSELSON: Objection.

A. So I think I recalled when you asked me before, whatever the well testing was that was required before you moved in is what we did, but I think I -- I'd refer back to what I said prior respectfully.

BY MS. SCHWARZ:

Q. Would you elaborate a bit on how you experienced annoyance, upset, aggravation, and inconvenience?

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- So you've seen my testimony as presented. Α. Ι think that that's a summary, but I can tell you that there is worry for my -- there's worry for my health. My hobbies have changed. I no longer have joy in my gardening. I don't have the same joy in canning. I don't have the same confidence in things that I grow. I'm inconvenienced the many, many times I've run out of bottled water because the delivery was late. I'm reminded when I go in my backyard and I see my well thing sticking out of the yard that it goes into a contaminated pool of groundwater that I once loved. It's very sad. The groundwater will not be the same in my lifetime.
- 16 Q. And how do you know that?
 - A. From what I've learned, the half life of PFOA is such -- well, I'm not a scientist. It's going to be in groundwater for a very long time.
 - Q. Your well has been -- oh, I'm sorry.

 MS. JOSELSON: Wait a minute.
- BY MS. SCHWARZ:
- 24 Q. I apologize.
 - A. So I've been stigmatized by this. I'm

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concerned when my family visits that they're afraid to be at my house. I'm afraid that will cause them to not want to visit.

I have fear for my health. I have fear for my retirement security financially, because I don't know what the impact of this whole thing is going to be on me.

It's had a very big impact on my ability to enjoy and live the way I used to before PFOA contamination and exposure.

BY MS. SCHWARZ:

- Q. Your -- your well water has been tested for PFOA after that initial test result, right?
- A. Mm-hmm, yes.

Q. And to your knowledge, is PFOA currently in your drinking water?

MS. JOSELSON: Objection.

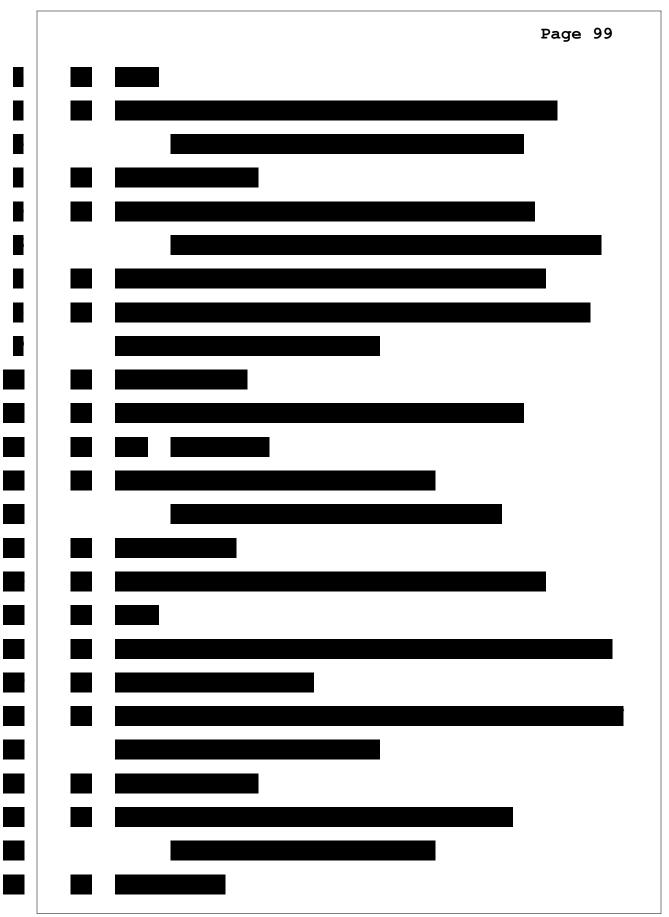
A. So PFOA, we are tested on a cycle. They have to replace the filter on some kind of a frequency. I don't know whether, when they replace that filter, whether there's leakage coming in. I know that there's still PFOA in the groundwater and they change my filter, but I don't know at that juncture whether they're timing it right. I don't know.

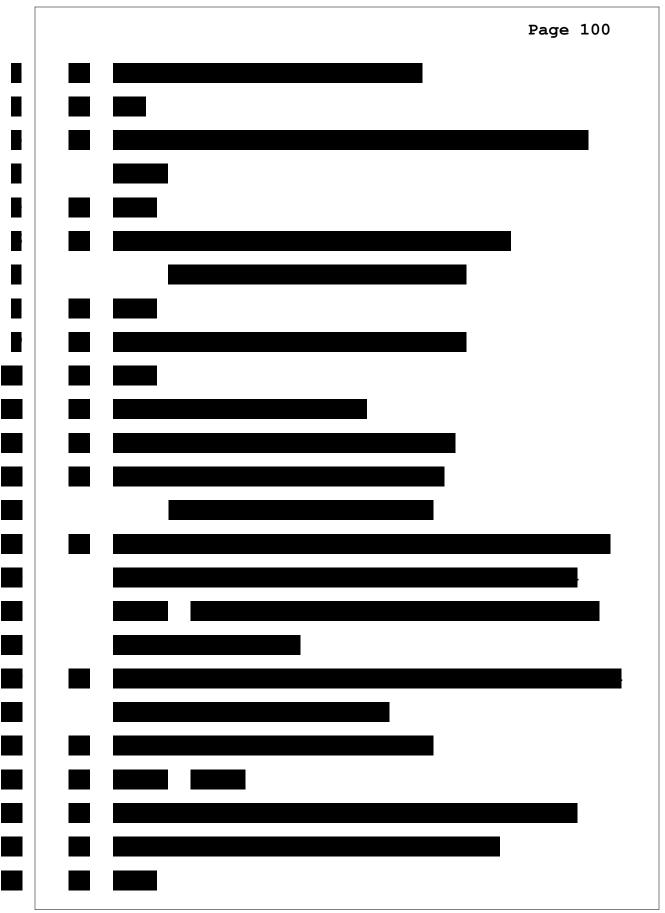
Page 95 1 BY MS. SCHWARZ: 2 Q. Have any of the test results indicated PFOA in 3 your drinking water? MS. JOSELSON: Objection. 4 5 They test when they replace --Α. BY MS. SCHWARZ: 6 7 Mm-hmm. Q. Α. 8 -- right? So actually I don't -- I don't -- I 9 don't know. I'm not able to answer that. 10 sorry. Not able to answer that. 11 BY MS. SCHWARZ: 12 To your knowledge --Q. 13 Α. To my knowledge when they get -- get the test 14 results, there's PFOA coming into the house. 15 I'm not confident because of the timing. 16 know on the day that they take that sample 17 what the PFOA is coming into the house. I'm 18 not confident on the days getting close to the 19 filter change that there's not PFOA coming in. 20 That's the best way I can answer that. 21 Q. If I'm understanding you correctly, on the day 22 that they take that sample and they test, does 23 that test indicate non-detect levels of PFOA? 24 Α. On the day --25 MS. JOSELSON: Objection.

Page 96 1 On the day that they test, yes, of the PFOA 2 out -- coming out of the -- I mean the water 3 coming through the PFOA. I'm sorry. getting all tongue tied. It's -- it's 4 5 non-detect after the POET on the day that they 6 test. 7 BY MS. SCHWARZ: 8 And how often do they test? Ο. 9 Α. I believe they've tested it about five times. 10 And when was the most recent time that they Q. 11 tested the POET? 12 Α. They came about two weeks ago, and I have not 13 gotten those results yet. 14 THE VIDEOGRAPHER: The time is now 15 approximately 11:50 a.m. This completes disc 16 No. 1 one of the deposition of Leslie Addison. Going off the record. 17 18 (Lunch recess taken.) 19 (Deposition Exhibit No. 4 was marked for 20 identification.) 21 THE VIDEOGRAPHER: The time is now 22 approximately 12:46 p.m. Going back on the 23 record with disc No. 2 of the deposition of 24 Leslie Addison. 25 BY MS. SCHWARZ:

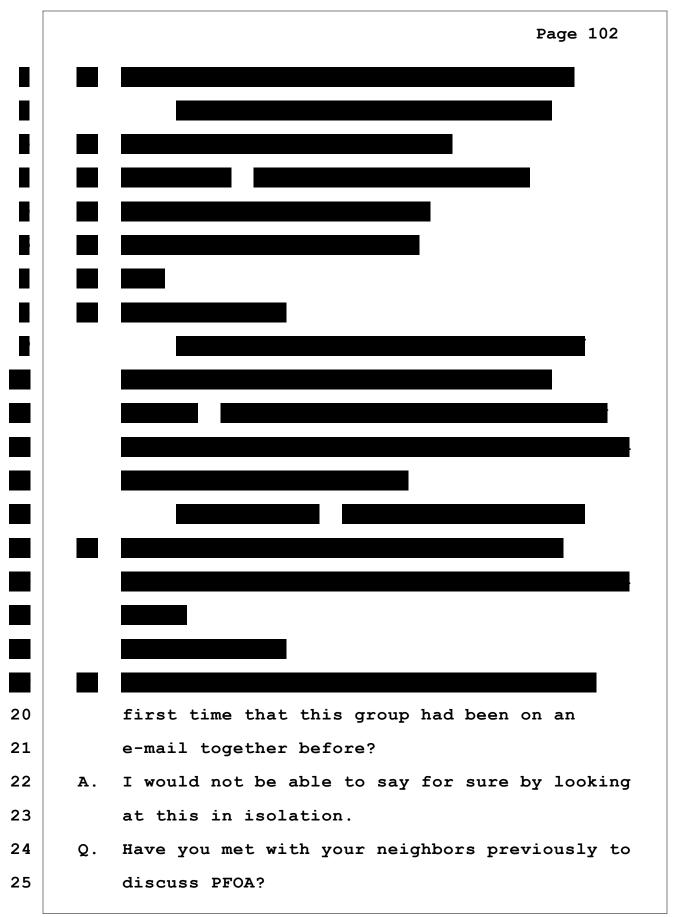
Page 97 1 Miss Addison, we just returned from a lunch 2 break. 3 Are you ready to continue? 4 Α. Yes. 5 I'm going to hand you what's been 0. 6 marked as Exhibit -- Exhibit 4 to your 7 deposition. 8 THE WITNESS: Thank you. 9 BY MS. SCHWARZ: 10 Take a moment and let me know if you recognize Q. 11 the document. 12 Yeah. Α. 13 Q. And what do you recognize it to be? 14 It's an e-mail from my neighbor. Α. 15 Q. And is that Sandy Sumner? 16 Α. Yes. 17 And Mr. Sumner starts the e-mail off with Q. 18 North Villagers. 19 Do you see that? 20 Α. Yes. 21 Is that the name of sort of your neighborhood, 22 the North Village? 23 There's a subsection of that upper part of the Α. 24 hill. I don't know anything more about the designation than that. 25

Page 98 1 I just want to -- is that a formal name for 2 it, or is that just something that the 3 neighbors kind of --4 I don't know where it came from. There's --Α. 5 might be a little sign there. Okay. And I just wanted to go through some of 6 Q. 7 these names and see if they were your neighbors and kind of what -- what the e-mail 8 9 is about generally. 10 Is that okay? 11 Α. Sure. 12 Okay. Great. So --Q. 13 MS. JOSELSON: I just want to note that 14 this is one of the documents that's marked 15 confidential, so we'll be proceeding pursuant 16 to the --17 MS. SCHWARZ: Absolutely. 18 MS. JOSELSON: -- agreement. 19 MS. SCHWARZ: Yeah. 20 BY MS. SCHWARZ:









I believe you -- I apologize. Withdrawn.

- I believe that you testified that
 you did -- you've had meetings, right, with
 your neighbors about PFOA; is that correct?
- A. Yes.

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- Q. Okay. Would these have been the neighbors that you met with to discuss PFOA in general?
- A. Because I don't know all of them on here, I
 can't say that they were in a meeting that I
 was at because I don't know some of these
 e-mail addresses. Some were at meetings that
 I attended, yes.
- Q. Did you ever have a meeting in your home with your neighbors to discuss PFOA?
- A. I would want to look back at my notes because there were a lot of meetings and conversations, so I wouldn't be able to say without my -- my log.
- Q. Okay. And I know you said that you -- you couldn't really tell whether you met with this group because some of the e-mail addresses weren't clear as to who -- who they were, correct?
- A. Can you rephrase the question?
 - Q. Sure. I asked -- I had asked you if you'd

Page 104 previously discussed PFOA in general with this group of people, and I believe your testimony was that you weren't sure because it wasn't clear from the e-mail address who some of the individuals were. Α. So I think --Q. So I get that --Α. I think what I meant was I wasn't able to answer your question the way it was worded because the exact composition of a meeting may or may not have been comprised of these exact people. Q. Right. I was at meetings with my neighbors --Q. Yeah. No, I think I ---- many of whom are here, so just to clarify Α. that answer. Yeah, no, I appreciate it. I think that I Q. understood you correctly, but let's go through the -- the ones that you could identify based on the e-mail addresses if we could.

Have you met with Todd Kobik to discuss PFOA?

- A. Yes.
- Q. And have you met with Jeff Whitesell?

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Page 105 1 Α. Yes. 2 Q. Have you met with anyone from Blue Heron 3 Construction? Yes. 4 Α. 5 And who would that be? 0. 6 Α. Jim Goodine. 7 Have you met with Mr. and Mrs. Ridley? Q. 8 Α. Yes. 9 And have you met with Shaina Kasper? Q. 10 Α. Yes. 11 The group of people that we just discussed, Q. 12 were those meetings -- did you have multiple 13 meetings? 14 Α. There was a -- was there more than one 15 meeting? 16 0. Yes. 17 Α. There was more than one meeting. 18 And would they be at specific locations? Q. 19 Were they at specific locations? Α. 20 Were they at a specific location or did it Q. 21 vary? 22 Α. It -- they were not at the same location, no. 23 I'm trying to remember when they where, but 24 where exactly I'm not -- I'd have to look at 25 that list again.

- Q. How frequently did you meet with your neighbors to discuss PFOA?
- A. Again, I'd have to look at the list because there wasn't a regular frequency. So without looking at that list, it would be hard to answer, but it seemed like it was probably three or four times at different neighbors' -- that I was in a meeting with different neighbors, different combination.
- Q. And what time frame are you -- are you talking about when you say you met with different neighbors in combination three or four times?
- A. Again, I would want to refer back to that document to be accurate, but the first one was probably within a month of discovering that this PFOA exposure is -- was happening.
- Q. And you referred to a list.
 - What list are you talking about?
- A. I had supplied a list to my attorneys of different meetings that I had attended.
- Q. Okay. And how many times have you met with Miss Shaina Kasper?
- A. Well, when you say met with her, she was at a meeting that I was at. Probably twice in neighborhood meetings. She may have also been

Page 107 1 at meetings that I was also at that were other 2 locations like at those town meetings. 3 Can you tell me the general discussions that Ο. you would have with your neighbors when you 4 5 had these meetings? 6 MS. JOSELSON: Objection. 7 BY MS. SCHWARZ: 8 What were you talking about? Q. 9 Α. What were we talking about? 10 Yeah. Q. 11 Α. PFOA. 12 Q. Okay. 13 Α. PFOA exposure, PFOA remediation, health 14 impact, and consoling each other. 15 Q. And the -- the three to four meetings that you 16 testified to previously, would they have 17 included the neighbors or the -- I'm sorry --18 the individuals that were not your neighbors? 19 MS. JOSELSON: Objection. 20 There -- there was not the same exact people Α. 21 at each meeting. So when you say did it 22 involve the people who were not my 23 neighbors --24 BY MS. SCHWARZ: 25 Q. Sure.

- A. -- can you rephrase that question?
- Q. I can try. You identified -- so, for example,

 let's start with Mr. Goodine. He -- he was

 not one of your neighbors, right?
- 5 A. Yeah.

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- Q. And was he at the three to four meetings that you testified to earlier that you had with your neighbors to discuss PFOA?
- A. I don't recall if he was at each one.
 - Q. Would it be fair to say that the issues you discussed then were not strictly limited to those that affected your neighborhood, if Mr. Goodine or anyone else that didn't live in the neighborhood was present?

MS. JOSELSON: Objection.

- A. Was it -- can you repeat the question?

 BY MS. SCHWARZ:
- 18 Q. Sure. When you were discussing PFOA --
- 19 A. Yeah.
- Q. -- were you discussing issues specific to your neighborhood, or were you discussing it in general?
 - A. Typically it was about our neighborhood, but it -- it's hard to say that it didn't say, yeah, this stinks for the whole community.

Page 109 1 It -- it involved -- the neighborhood brought 2 us together, but, yeah, PFOA affected beyond 3 that. So the conversations would not just be limited to our neighborhood. 4 5 Mr. Goodine owns property in our 6 neighborhood. He doesn't live there as a 7 neighbor. Mm-hmm. And does Miss Kasper live in your 8 Q. 9 neighborhood? 10 Who? Α. 11 Miss Kasper, Shaina Kasper? Ο. 12 Α. Not that I'm aware of. 13 Q. And would she provide information from the 14 Toxics Action Center at the two meetings you 15 testified she attended? 16 MS. JOSELSON: Objection. 17 Α. I believe once she did about her organization, and I don't recall if she did at another time. 18 19 I think she was also a listener. 20 BY MS. SCHWARZ: 21 Q. Do you recall who organized these meetings 22 typically? 23 Α. No. 24 Did you ever organize a neighbor meeting? Q. 25 Α. No, not that I can recall.

Page 110 1 Did your husband? Q. 2 Α. Not that I can recall. Did you discuss bringing a lawsuit during any 3 Ο. of these meetings with your neighbors? 4 5 Α. Yes. 6 Can you tell me specifically the neighbors Ο. 7 that you recall discussing bringing a lawsuit 8 with? 9 No, I wouldn't be able to recall the exact 10 composition of those meetings. 11 Okay. Of the neighbors that were -- that you 0. 12 discussed bringing a lawsuit with; is that what --13 14 Α. That's a different -- I'm sorry, you worded it 15 differently so --16 I said can you -- I said can you tell 0. 17 me the specific neighbors that you did discuss 18 bringing a lawsuit with? 19 Objection. MS. JOSELSON: 20 So that's a -- that's new question, right, Α. 21 because you said -- before you were talking 22 about meetings and now you're asking who I had 23 conversations with about a lawsuit? 24 BY MS. SCHWARZ: 25 Q. I said -- I said meeting -- I just said

Page 111 1 specific neighbors that you had meetings with. 2 Α. I can tell you who I remembered being there. I know that the Camelios were 3 involved, Sandy, Beckerman. I can't recall 4 5 beyond that. 6 Ο. And did you have conversations with any other 7 neighbors that you didn't mention? 8 MS. JOSELSON: Objection. 9 Α. Conversations not at a meeting? 10 BY MS. SCHWARZ: 11 Right. I think earlier you made a distinction 0. 12 or you thought I made distinction with respect 13 to discussing it in a conversation versus 14 meeting to discuss the litigation -- or 15 bringing a litigation. 16 So I'm just asking --17 It would be the same --Α. 18 MS. JOSELSON: Wait a minute. Let -- let 19 her ask her question. 20 Α. Sorry. 21 BY MS. SCHWARZ: 22 I'm just asking whether you had conversations Q. 23 with neighbors in addition to the Camelios, 24 Mr. Sumner and Mr. Beckerman about commencing 25 litigation.

Page 112 1 It usually -- conversations would --Α. 2 would -- really when I'd see them would be at 3 a meeting. And when you -- when you did discuss 4 Q. 5 litigation --6 Α. I -- I need to correct that. 7 Q. Sure. 8 Α. And there may have been some e-mail 9 communications, as well. 10 About -- about what? Q. 11 The litigation. Α. 12 Okay. And when you were discussing it, what Q. 13 was the -- sort of the nature of the -- those 14 discussions? 15 MS. JOSELSON: Objection. 16 Do we want to and how to proceed. Α. 17 BY MS. SCHWARZ: 18 Were there different opinions on that? Q. 19 Yes. Α. 20 Are the -- is Mr. Beckerman part of the class Q. 21 action? 22 Α. Yes. 23 Are Mr. and Mrs. Camelio part of the class Q. 24 action?

Α.

Yes.

Page 113 1 Is Mr. Goodine part of the class action? Q. 2 Α. Yes. And Mr. Whitesell? 3 Ο. 4 Α. Yes. 5 MS. SCHWARZ: I'm going to mark the next 6 exhibit. 7 (Deposition Exhibit No. 5 was marked for 8 identification.) 9 Q. Miss Addison, I'm handing you Exhibit 5 for 10 your deposition. Just take a moment and let 11 me know if you recognize it. 12 Α. (Witness complying) 13 (Off-the-record colloquy.) 14 Yes, I recognize it. Α. 15 BY MS. SCHWARZ: 16 What do you recognize it to be? 0. 17 It is First Set of Interrogatories to Α. Plaintiffs. 18 19 Q. And did you -- did you prepare responses to 20 this document? 21 I provided information to the attorneys who Α. 22 provided this document on my behalf. 23 I'm sorry. I didn't -- I didn't mean to Q. 24 interrupt you. On my behalf. 25 Α.

- 1 Q. And is that your signature on page 11?
- 2 A. Yes.
- Q. Is there anything that you wish to correct in the document?
- A. I could only answer that by saying there's
 been a lot of documents presented, so I would
 leave anything to my attorneys to respond if
 there was updates to this provided during the
 last --
- 10 Q. Okay. If you go to page 7, please.
- 11 A. (Witness complying)
- Q. Is this the -- the list that you had in mind --
- 14 A. Yes.
- Q. Okay. And in your -- could you explain what this list is?
- A. It was in response to identifying the answer to No. 9.
- Q. At each meeting that you -- you attended in which there was discussion of PFOA, plaintiffs allege property damage for this case.
- Is that generally accurate?
- A. Yes, it looks like you're reading from No. 9.
- 24 Q. Yeah.
- 25 A. Yes.

- Q. So under your name on page 7, I want to -- if you could turn your attention to, there are two -- looks like two sort of listings for May 2016.
 - Do you see that?
- 6 A. Yeah.

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- Q. And the first one --
- 8 A. Yeah.
- 9 Q. -- says the following: May 2016, dash, Jim
 10 and I were asked to talk to T. J. Donovan,
 11 Chittenden County District Attorney, who was
 12 campaigning for Vermont attorney general and
 13 trying to understand the PFOA situation from
 14 the perspective of persons affected. We met
 15 in Manchester, Vermont, at the Copper Grouse.
- 16 A. Copper.
- Q. Is that grouse? Am I reading that correctly?
- 18 A. Yes.
- 19 Q. Did I read that correctly?
- 20 A. You did.
- 21 Q. What was the purpose of this meeting?
- A. He was trying to understand the PFOA situation and the impact from our perspective.
- Q. And how -- did he -- did Mr. Donovan contact you?

- A. I believe a representative of Mr. Donovan contacted Jim.
 - Q. And what was discussed at the meeting?
- 4 A. The impact on us as a person impacted by PFOA.
- Q. Did -- did any other plaintiffs or class members attend the meeting?
- 7 A. No.

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- 8 Q. And did you discuss this litigation?
- 9 A. I don't recall all the details of the conversation.
- Q. And Mr. Donovan is now the state attorney general; is that right?
- 13 A. I believe so.
- Q. And have you or your husband spoken with Mr.

 Donovan since May of 2016?
 - A. I don't recall -- the only time I might have seen him he -- no, I'm going to say no. He may have been at a public meeting once, but I don't recall saying hello or acknowledging him or anything like that.
 - Q. Other than the -- the meeting that you've mentioned, did you have any other communications or meetings with other class members prior to commencing the lawsuit?

 MS. JOSELSON: Objection.

Page 117 1 Other than this list right here, was there Α. 2 other meetings that I have not disclosed? BY MS. SCHWARZ: 3 With other -- did you have conversations with 4 Q. 5 other class members not limited to -- to the 6 list now? 7 MS. JOSELSON: Objection. 8 Did I have conversations with anybody in the Α. 9 class about PFOA prior to --10 BY MS. SCHWARZ: 11 Commencing this lawsuit. Q. 12 Α. -- commercing this lawsuit? 13 Q. Yeah. 14 Α. Yes. 15 Q. Do you recall who? 16 Not specifically. Α. 17 Q. But your recollection is that they -- that 18 they weren't class members? 19 They were or were not? Α. 20 Were. Q. 21 MS. JOSELSON: Objection. You're asking 22 about class members before the lawsuit was 23 filed? 24 MS. SCHWARZ: I'm asking my question. 25 MS. JOSELSON: Well, I object to the

Page 118 1 form --2 MS. SCHWARZ: Okay. 3 MS. JOSELSON: -- since there can be no class members before litigation is filed. 4 5 So I can say that when there's a gathering of 6 neighbors at a town meeting to talk about 7 potential contamination in their neighborhood 8 and I know they're neighbors of mine, I'm --9 they were neighbors. 10 BY MS. SCHWARZ: 11 And since commencing the lawsuit, have you had Ο. 12 any communications or meetings with other 13 class members? 14 MS. JOSELSON: Objection. 15 I would have small talk conversations at Α. 16 public meetings and then -- I mean, obviously 17 I've given this list of the meetings, but when 18 you say conversations --19 BY MS. SCHWARZ: 20 Mm-hmm. Q. 21 -- would be casual conversations when I see Α. 22 people at a public meeting. The very last entry there that starts: 23 Q. 24 3/15/2016 meeting with neighbors of the North 25 Village Development at John and Laurie

Page 119 1 Camelio's house to discuss the contamination, 2 concerns, options, may also have been attended 3 by a representative from Toxic Action Network, but I do not recall which of the neighbor 4 5 meetings they attended. 6 Did I read that correctly? 7 Α. Yeah. 8 What -- do you recall the options that you 0. 9 discussed at this meeting? 10 Yes, very broadly. It's, you know, do you Α. 11 want to act or not, how do you act, and with 12 whom, so --13 And what do you mean when you say act? Q. 14 Do we want to bring a lawsuit or not. Α. 15 Q. Were there other neighbors that attended this 16 meeting, if you recall? 17 Α. Well, it was a meeting with neighbors, so 18 there were neighbors there. 19 When you say other neighbors, what do you 20 I'm sorry. mean? 21 Do you recall anyone else at -- at this 22 meeting at Mr. and Mrs. Camelio's house? 23 So I can't recall specifically. I think I Α. 24 kind of answered that in a previous question,

but that particular one I don't recall

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- Q. On the next page there, page 8, the second full entry. It's March 6th of 2016. PFOA informational meeting, Hoosick Falls, dash, community meeting hosted by Flint & Granish, PLLC, Attorneys At Law. Guest speakers included Richard Clapp, MHP, Harvard School of Public Health, epidemiologist and PFOA expert. Attended by me, Jim and other neighbors in the North Village Development.
- 11 A. Yeah.
 - Q. Do you recall that meeting?
- 13 A. I do.
 - Q. And in general can you tell me what was discussed at the meeting?
 - A. There was a public health person who talked about PFOA. There was -- there was a legal firm there who were there to offer their support and services, but I don't recall exactly what they presented.

I recall it more being just learning about PFOA and then this epidemiologist presenting.

Q. And what information did you receive from the epidemiologist that was presenting?

- A. I don't recall specifically, but he spoke about PFOA exposure.
- Q. Were -- did -- were there any handouts at the this meeting, if you can remember?
 - A. Any handouts that I had I supplied to my attorneys, so I would have to refer back to the -- the books if I had anything.
 - Q. Have you ever had individual communications with anyone at the Vermont DEC about PFOA contamination?
- MS. JOSELSON: Objection. Asked and answered.
- 13 You can answer it again.
- 14 A. Yes.

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- BY MS. SCHWARZ:
- 16 O. With whom?
- 17 A. Mr. Spiese.
- 18 Q. Anyone else?
- A. I probably had kind words exchanged with the commissioner at the time at a public meeting.
- 21 That's it.
- Q. The individual communication with Mr. Spiese, was that in person?
- 24 A. Yes.
- Q. And did -- where -- where did that happen?

Page 122 1 Where were you? 2 Α. So there was a dialogue that I had with him at 3 a neighbor's home. I know I had conversations with him when he came to the house to do 4 5 testing initially and again kind words in 6 passing if I'd see him at a public meeting. 7 Did you have any individual communications Q. 8 with anyone from the Vermont Department of 9 Health? 10 Yes. Α. 11 And what was the nature of those 0. 12 conversations? 13 Α. It was to advocate for additional blood draws 14 for kids who were away at colleges. 15 Q. Any -- anything else? 16 Establish -- making my own appointment. Α. 17 to call them directly to make my appointment. 18 That's all can I recall. And, of course, I 19 talked to them when I had my blood drawn. 20 Did you discuss the -- this litigation with Q. 21 Mr. Spiese? 22 Α. No. 23 Did you discuss this litigation with anyone at 0. 24 Vermont DEC?

Α.

No.

Page 123 1 Did you discuss this litigation with anyone at 2 Vermont DOH? 3 No. Α. 4 How about with Mrs. -- Ms. Lori Cragin? Q. 5 Α. I'm not recalling who Miss Cragin is. 6 sorry. 7 We're all set with that one. Q. 8 Miss Addison, turning back to your home 9 at 35 Asa's Way. 10 Do you recall having it appraised in 2010? 11 12 Α. Yes. 13 (Deposition Exhibit No. 6 was marked for 14 identification.) 15 Q. Okay. I'm going to hand you what's been 16 marked as Exhibit 6 for the deposition. 17 Α. Thank you. 18 Q. Sure. Take your time. 19 Let me know if you've seen this document 20 before. 21 Did you mean to hand me two? You said Α. 22 document 6. 23 Q. Thank you. 24 Α. Okay. 25 Q. Have you seen this before?

Page 124 1 Α. Yes. 2 Q. When was the last time you saw this document? 3 I think I looked at it within the last month. Α. Does this appear to be an appraisal report 4 Q. 5 from 2010? 6 Α. Yes. 7 And why did you have your home appraised in Q. 2010? 8 9 THE WITNESS: Can we move this a tad 10 because it's blocking the light a little bit. 11 I'm having a hard time seeing the little 12 It's just a shadow or something here. print. Is there a way to move that screen back? 13 14 (Off-the-record colloquy.) 15 BY MS. SCHWARZ: 16 Why did you have your home appraised in 2010? 0. 17 Α. We were refinancing our mortgage. 18 And do you recall the -- how much your home Q. 19 was ultimately appraised for? 20 I can direct you to it. It says 3148 at 21 the bottom. 22 Α. I'm sorry. Where are you looking at? 23 MS. JOSELSON: The Bates numbers at the 24 bottom, 3148 she's directing you to. 25 BY MS. SCHWARZ:

- 1 Q. Very bottom left-hand corner there.
- 2 A. The bottom left-hand corner I'm seeing not --
- yes. Yes, on the bottom of 3148. Yes, I'm
- 4 seeing the appraisal.
- 5 Q. 325,000, is that what you're seeing?
- 6 A. I believe that's what I see. The lighting is
- 7 really bad here, I'm sorry, and with my
- 8 reading glasses, it's -- I think that's what
- 9 it says.
- 10 Q. That's what I see, too.
- 11 A. Okay.
- 12 Q. Do you recall whether this was the same amount
- that you and your husband had spent to
- 14 construct the home?
- 15 A. It was not what we spent.
- 16 Q. Was that higher or lower?
- 17 A. It was lower.
- 18 Q. And did you express your opinion that it was
- 19 too -- the appraisal value was too low with
- 20 anyone?
- 21 MS. JOSELSON: Objection.
- 22 A. Yes. Jim and I believed that it was too low,
- and we expressed that to each other.
- BY MS. SCHWARZ:
- 25 Q. Anyone -- anyone else?

Page 126 1 Α. No. 2 Q. Why not? 3 We were able to do the transaction that we Α. 4 needed. 5 And I'm going to hand you Exhibit 7 to your Q. 6 deposition. 7 (Deposition Exhibit No. 7 was marked for 8 identification.) 9 Q. Do you recognize this document? 10 Α. Yes. 11 And what do you recognize it to be? Q. 12 Α. It's the 2012 appraisal of the home. 13 Q. And why was your home appraised in 2012? 14 We were refinancing again. Α. 15 Q. And if I could direct you to page ending in 16 Bates No. 2958? 17 Yeah. Α. Bottom left-hand corner there. 18 Q. 19 Α. Yes. 20 Q. Do you see the value there? 21 Α. Yes. 22 Q. And \$300,000 is the appraisal value. 23 That is. Α. 24 Q. And that reflects a drop of 25,000 from the 25 appraisal two years prior?

Page 127 1 MS. JOSELSON: Objection. 2 Α. Yes. BY MS. SCHWARZ: 3 4 Do you have an understanding as to the reason Q. 5 for the decrease in value? 6 Α. No. 7 MS. JOSELSON: Objection. BY MS. SCHWARZ: 8 9 Q. Did you ask anyone? 10 Α. Did I ask anyone? 11 0. Mm-hmm. 12 Α. No. 13 Q. Have you ever appraised any property yourself? 14 No. Α. 15 Q. Do you have any training or experience in real 16 estate appraisal? 17 I do not have formal training in real estate Α. 18 appraisal, if that's what you're asking. I'm 19 sorry. 20 Do you have informal training? Q. 21 I have my -- I have what -- I -- I do not have Α. 22 informal training. I have my opinion on my 23 home's value. 24 Q. Do you have any training in real estate sales? 25 Α. No.

Page 128 1 Have you ever listed or sold a property? Q. 2 Α. No. 3 (Deposition Exhibit No. 8 was marked for identification.) 4 5 Miss Addison, you've been handed what's been Q. 6 marked Exhibit 8 to your deposition. Take a 7 moment and let me know if you recognize the 8 document. 9 Α. Yes. 10 And what -- what do you recognize it to be? Q. 11 It's a tax bill. Α. 12 I think if you go through the exhibit, it's Q. 13 several tax bills, if you agree? 14 Yes, there are several tax bills. Α. 15 Q. Are these tax bills that the Village of North 16 Bennington sent to you? 17 Α. Yes. 18 So on the first page there it says, 2013 to Q. 19 2014 of the tax year in the box on the 20 left-hand side? 21 Mm-hmm. Α. 22 Q. Would you agree that this is the tax bill for 23 the 2013 to 2014? 24 Α. It appears to be.

And just below your address there, see owner

Q.

Page 129 1 and it lists Mr. Sullivan and yourself. 2 Do you see that? 3 Α. Yes. And just below that it says assessed value? 4 5 Α. Yes. 6 0. And it says 243,100? 7 Yes, it's what it says. Α. 8 And if you look at the box on the right-hand Q. 9 side at the top where it says, house site tax 10 information, the third line down says house 11 site value. 12 Do you see that? 13 Α. I see it. 14 And it says 243,100. 0. 15 Do you see that? 16 I do see it. Α. 17 Okay. Do you think this accurately reflects Q. 18 the value of your home in 2013 to 2014? 19 MS. JOSELSON: Objection. 20 I do not. Α. 21 BY MS. SCHWARZ: 22 Q. Other than discussing it with your husband, 23 did you express -- either of you express that 24 opinion to any other -- anyone else? 25 Α. No.

Page 130 1 Q. Why not? 2 Α. I didn't feel the need to do so. 3 If you flip the page, it's the tax bill for Ο. 2014 to 2015. 4 5 I can direct you again to the value, that 6 they're in the same place under assessed value 7 It says 243,100. there. Do you see that? 8 9 Α. I do see it. 10 And on the right-hand side in that box house 11 site value, also 243,100. 12 Do you see that? I see it. 13 Α. 14 And that's the same as it was in 2013 to 2014, 15 right? 16 I'm sorry? Α. That's the same value or -- that we saw --17 Q. 18 Α. Yes. 19 -- for 2013 to 2014? Q. 20 Α. Yes. 21 And we -- we can walk through them and feel Ο. 22 free to do so, but I'll represent to you that 23 each year for 2015 to 2016, 2016 and 2017 has 24 the same house site value. 25 Do you have any reason to dispute that?

Page 131 1 Is there any reason to dispute it with you Α. 2 that that's what it says? 3 0. Yes, yes, what the document says. And feel free -- yeah, feel free to check it out. 4 5 That's what it says. Α. 6 Ο. And I imagine you continue to disagree with 7 that valuation? 8 Α. I do. 9 Q. It does it remain the case that you haven't 10 challenged or contested the tax assessor's 11 valuation? 12 That is correct. Α. 13 (Deposition Exhibit No. 9 was marked for 14 identification.) 15 Miss Addison, you've been handed what's been Q. 16 marked as Exhibit --17 MS. JOSELSON: 9? 18 BY MS. SCHWARZ: 19 Q. -- 9 to your deposition. 20 Do you recognize this document? 21 Α. Yes. 22 Q. And what do you recognize it to be? 23 Disclosure -- Fourth Supplemental Disclosures Α. 24 on Merit Issues.

And did you prepare this document?

Q.

- A. My attorneys prepared the document.
- Q. And at the bottom of the second page there, do you see where it says, Plaintiffs Sullivan and Addison will testify that the value of their property, assuming no PFOA contamination from defendant's operations, is 400 to 420,000.

Do you see that?

A. Yes.

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- Q. If I just stop there. So is it your testimony that your home would be worth between 400 and 420,000 if there was no PFOA detected in the well water?
- 13 A. Yes.
 - Q. And do you agree that number is approximately
 75 percent higher than the value at the town
 of Bennington has given your property for the
 last four years based on the tax bills?

 MS. JOSELSON: Objection.
 - A. Is that 75? I'm not -- I'm not doing the quick math. In reverse it's definitely higher. I know what I -- I know what I paid to buy my --

MR. SILVER: Just answer the question.

BY MS. SCHWARZ:

Q. And did you arrive at your opinion on the

- 1 value of your home on your own?
- 2 Α. Yes, in consultation with my husband.
- 3 0. Did you also consult a third party, or was it just the two of you?
 - Jim -- Jim and I talked it through, and Α. we've had guidance from our attorneys in general, but we have opinions on what we believe our house to be worth.
 - Can you tell me what was that value based on? Q.
 - That was based on what it cost us to build the Α. property. It was based on enhancements that we made to the property since we built the house. It's based on our knowledge of our neighborhood, the views, the -- the construction material that were used, the energy efficiency.
 - Ο. And does the value reflect a comparison with homes where PFOA hasn't been detected? MS. JOSELSON: Objection.
 - I know what we paid to build the house. Α. know the materials. We know the quality. know the quality of the builder itself. We know what we put into it. This is what we feel like our property is worth.

25 BY MS. SCHWARZ:

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Page 134 1 Did you compare it to homes where PFOA Q. 2 hadn't been detected to come up with this 3 value? 4 Α. No. 5 And I know you testified that you aren't a Ο. 6 license real estate appraiser, correct? 7 That's correct. Α. 8 MS. JOSELSON: Asked and answered. BY MS. SCHWARZ: 9 10 Is your husband a licensed real estate Q. 11 appraiser? 12 Α. He is not. 13 Q. Is he a licensed real estate agent? 14 Α. No. 15 Q. And do either of you have any experience 16 valuing real property? 17 MS. JOSELSON: Objection. 18 Α. I don't know the term real property. When 19 you -- what do you mean? Can you quality 20 that? 21 BY MS. SCHWARZ: 22 Q. Do you have experience valuing a home? 23 MS. JOSELSON: Objection. 24 Α. I am comfortable valuing my own home. 25 BY MS. SCHWARZ:

Page 135 1 Have you had experience doing that in the past 2 with any other home? 3 Α. No. Going back to Exhibit -- Exhibit 6. 4 Q. 5 going to be the interrogatories. 6 We're going to go back to Exhibit 5 for 7 one moment. 8 Here you go, Miss Addison. 9 MS. JOSELSON: Are those the 10 interrogatories? I didn't mark mine. I'm sorry? 11 MS. SCHWARZ: 12 MS. JOSELSON: Are those the 13 interrogatories? 14 MS. SCHWARZ: Yes, the -- yes. 15 BY MS. SCHWARZ: 16 If I can direct you, Miss Addison, to No. 2, Ο. 17 and there it says: For each property describe the instances in which the value has been 18 19 assessed or determined, including the dates of 20 any valuations, identification of who 21 performed the valuations and the results of 22 any valuations. 23 Do you see that? 24 Α. Yes. 25 0. And in response to the interrogatory, do you

Page 136 1 agree that you and your husband stated that 2 you had invested a total of \$483,500 in your 3 home? Yes. 4 Α. 5 And that represents the cost of the lot, Blue 0. Heron Construction's costs and the costs of 6 7 the additional components; is that accurate? 8 Α. Yes. 9 483,500 is -- is higher than the value that Q. 10 you gave your home in the fourth supplemental 11 initial disclosures that we just reviewed, 12 right? 13 Α. Can you refer to what exhibit that is and I can look at it with you? 14 15 That was -- 9 was the last one. Q. 16 At the bottom of the second page there. 17 Α. Oh, okay. Plaintiff Sullivan and Addison will testify --18 Ο. 19 Yeah. Α. 20 -- value assuming no PFOA contamination. Q. 21 Α. Yeah. 22 Q. There it's between 400 and 420,000. 23 Α. Right. 24 Right? So that's lower than the number we see Q. 25

here --

Page 137 1 Α. Right. 2 Q. -- in response to the first interrogatories, 3 which is 469,800? Yeah. 4 Α. 5 MS. JOSELSON: Objection. 6 BY MS. SCHWARZ: 7 Do you believe your home is worth less in Q. 8 value today compared to what you've invested in it? 9 10 I believe my house to be worth what is in my Α. 11 disclosure here now had it not been for PFOA. 12 And, I'm sorry, can you repeat the 13 question? I don't think I answered it. 14 So is -- is it your belief today that Ο. 15 your home is worth less than what you have put 16 into it? 17 Today I think my house is worth a lot Α. Yes. 18 less than I put into it because right now we 19 don't have clean -- don't have municipal 20 water. 21 Q. The value that you estimated between that --22 between 400 and 420,000, that value is what 23 you estimated without PFOA? 24 Α. Yes. 25 Q. Right?

Page 138 1 Α. Yes. 2 And that's still lower than the value that we Ο. see here, which is 469,800, right? 3 4 MS. JOSELSON: Asked and answered. And 5 that's not what -- you're not correctly 6 quoting the interrogatory answer. 7 But you can answer if you understand it. 8 Can you repeat the question? Α. BY MS. SCHWARZ: 9 10 Sure. Q. 11 Miss Addison, in response to 12 interrogatory No. 2 there, the last 13 sentence --14 Α. Mm-hmm. 15 Q. -- total investment by the owners in the 16 property is approximately 483,500. 17 Yes. Α. Consistent with the insured value of 460 --18 Q. 19 469,800 --20 Yes. Α. 21 -- which is adjusted for inflation --Ο. 22 Α. Yes. 23 -- doesn't include the lot or site 0. 24 improvements. 25 Α. Yes.

Page 139 Do you agree with that figure, that \$483,500 reflects the total investment by you and Mr. Sullivan? Α. Yes. Do you also agree that that number is higher 0. than what you estimated in response to our interrogatory -- supplemental disclosures bottom of page 2 where you valuated it between 400 and 420,000 without PFOA? MS. JOSELSON: I think that's about the fourth time you asked that question. MS. SCHWARZ: It's the fourth time you've interrupted me. It's just a form objection. MS. SILVER: You're -- you're conflating estimated investment with value. It's different. MS. SCHWARZ: Are you -- are you testifying? MS. JOSELSON: How many times do you want to ask this question? MS. SCHWARZ: The objection is form. That's it. MS. JOSELSON: How many times do you want to ask it?

The objection is form.

MS. SCHWARZ:

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1		can ask the judge what he thinks the
2		objection is form.
3		MS. JOSELSON: I can make any objections
4		I wish.
5		How many times do you intend to ask the
6		same question?
7		MS. SCHWARZ: No, I'm not you can ask
8		me that when you take my deposition.
9		MS. JOSELSON: Same objection I made
10		through the other times you've asked the
11		question. It's been asked and answered.
12		You can answer it again if you understand
13		what she's asking you, but if you don't, then
14		don't.
15		MS. SCHWARZ: Can you stop coaching the
16		witness, Miss Joselson?
17		MS. JOSELSON: I am not coaching the
18		witness.
19		MS. SCHWARZ: You are. You certainly
20		are.
21	A.	I can answer it by saying that this page has a
22		different number than this page.
23		BY MS. SCHWARZ:
24	Q.	Okay.
25		MS. SCHWARZ: We're all set with those.

		Page 141
1		(Off-the-record colloquy.)
2	Q.	Miss Addison, approximately how many other
3		homes are in your neighborhood?
4	A.	I'm not able to answer that, not knowing what
5		you mean by neighborhood.
6	Q.	So let's start with your street.
7		How many other homes are on Asa Way?
8	A.	On Asa's Way?
9	Q.	Mm-hmm.
10	A.	One, two, three one, two, three, four,
11		five, six six.
12	Q.	Are there additional lots that are empty?
13	A.	Yes.
L 4	Q.	How many lots how many additional lots are
15		on Asa's Way?
16	A.	One three definite. There may be one more.
17	Q.	Were were all the homes on your street
18		built in the same year as your home?
19	A.	I can't answer that. I don't know.
20	Q.	Have you been in any of your neighbors' homes?
21	A.	Yes.
22	Q.	And by neighbors I'm sorry.
23		Have you been in any of your neighbors'
24		homes on Asa's Way?
25	A.	Yes.

Page 142 Would you say all of the homes on Asa's Way 1 2 are the same type as yours? MS. JOSELSON: Objection. 3 4 Α. What do you mean by type? 5 BY MS. SCHWARZ: I mean is -- are they made out of the same 6 0. 7 material, as far as you know? 8 I don't know what they're made out of. Α. 9 Are they all the same size? Q. 10 Α. I -- I don't know their size. 11 Do they -- do they all have the same 0. 12 properties -- the size of the lots of each of 13 the homes, do they have the same size 14 backyard? 15 MS. JOSELSON: Object. 16 I don't know their lot size. Α. 17 BY MS. SCHWARZ: 18 The homes that you've been in, do they have Q. 19 the same materials inside that you used when 20 constructing your home? 21 MS. JOSELSON: Objection. 22 Α. I -- I didn't ask them what materials they 23 used when they constructed their home. 24 BY MS. SCHWARZ: 25 Q. Did you observe any?

Page 143 I was in one of my neighbor's kitchen. Ι don't recall looking closely what the building materials were. Do you have air -- central air in your home? Q. Α. No. 0. Do you have window units? Α. We have -- no. Not window units. They're built -- they're individual things built in to the wall. And that's for air conditioning? Q. Α. Yes. Can you just elaborate a little bit more or --Q. Α. I'm sorry. In the bedrooms it's an air conditioning unit. Q. And what type of heating system do you have? We have a pellet stove, and then we have Α. oil -- we have oil heat that generates coils under the floor. I'm not calling it the right name. And then we have radiators in the upstairs bedrooms. Would you describe it as a custom design? MS. JOSELSON: Objection. BY MS. SCHWARZ: Q. Did you design that yourself with your

husband?

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Page 144 1 I don't -- can you clarify the question? Α. 2 Q. Sure. It just sounds like a complicated 3 heating system. Was it -- did you and your husband design 4 5 it? 6 In other words, do you know any of 7 your -- whether any of your neighbors have a 8 pellet stove? 9 Α. I don't recall seeing a pellet stove, so I 10 don't know. 11 Where do you purchase the pellets? 0. 12 Α. My husband orders them and they're delivered. 13 I don't know where he gets them. 14 Do you know what they're made of? 0. 15 Wood. Α. 16 Does every home on Asa's Way have a front 0. 17 yard? 18 Α. Yes. 19 And does every home have the same sized front Q. 20 yard? 21 Α. I don't know what the square footage is. 22 Q. You don't have to be specific about it. 23 In general does every home have the same 24 sized front yard? 25 MS. JOSELSON: Objection.

Page 145

- A. I don't know how to answer that if I don't know the footage so -
 BY MS. SCHWARZ:
- Q. Okay. Have you seen any front yards that are bigger than yours on your street?
 - A. The shape of mine is different because of the way it slopes down. So again, I'd have to compare square footage to square footage.
- 9 Q. I understand.
- 10 A. Sorry.

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- Q. Oh, no, that's -- don't apologize.
- Can you describe the shape of -- of yours, your front yard?
 - A. So like I said before that -- and respectfully -- I'm not referring to it as a front yard because of the way the design is. So I'm kind of saying along the side of my house and forward I'm considering front.
 - Q. I apologize.
 - A. So, you know, in front of my house itself, there's a small area of grass, and then along the sides of my property where it comes down to the road, there's more grass that kind of slopes down on a hill.
 - Q. And that's different from other front yards on

Page 146 1 Asa's Way? 2 Different how? Α. 3 0. The shape is different than the other front 4 yards on Asa's Way? 5 The shape of the yard? Α. 6 0. Yes. 7 Α. So one of my neighbor's yards has a slope in 8 the front. 9 Q. Is that neighbor --10 So part of the shape is the same because it's Α. 11 sloping. 12 I'm just asking -- Miss Addison, I believe you Q. 13 testified you couldn't compare them because 14 yours is different because of the slope. 15 MS. JOSELSON: There's no pending 16 question. 17 I believe what I said is that I couldn't Α. 18 compare the size. 19 BY MS. SCHWARZ: 20 Right. Q. 21 Α. So now you're asking about the shape. 22 So the shape and the size, in my mind, are two 23 different things. 24 Q. Pardon me. I thought that your testimony was 25 that you couldn't compare the sizes because

Page 147 1 the shapes were different. 2 Is that not accurate? Because in my mind the -- so if the shape is 3 Α. different, in my mind I'm trying to convert it 4 5 to square footage because you're asking about 6 size. 7 I understand. Q. Mm-hmm. 8 Α. So I'm saying, you know, putting a slope and 9 I'm trying to figure out square footage and 10 I'm kind of comparing it against their front, 11 so I'm answering it as best as I'm able to. 12 I appreciate that. Okay. So but are the --Q. 13 is the shape of your yard the same as other 14 front yards on Asa's Way? MS. JOSELSON: Asked and answered. 15 16 You can answer it again. 17 Α. I believe I answered it. I'm sorry. 18 BY MS. SCHWARZ: 19 Could you --Q. 20 I don't think I can change the wording again. Α. 21 Ο. And I may have missed it, but can you 22 repeat --23 Α. Okay. 24 Is the shape of your front yard the same as Q. 25 the other front yards on Asa's Way?

Page 148 1 Asked and answered. MS. JOSELSON: 2 You can answer it again. 3 Α. So I have slopes. 4 BY MS. SCHWARZ: 5 Yes. 0. 6 Α. Some of my neighbors have slopes. I have a 7 flat, and some of my neighbors have flats. 8 Okay. And I believe you testified your home 0. 9 is built -- built into a hill; is that 10 accurate? 11 It's built into the slope. Α. 12 Okay. And is that true for your neighbors, as Q. 13 well, that they're built in the hill? 14 No. Α. 15 Q. If you know, can you tell me how many other 16 properties on Asa's Way have a well? Some of the lots are empty, so they don't have 17 Α. well. And I believe all the other houses on 18 19 Asa's Way have a well, and they're not 20 connected to municipal water. 21 Q. Happen to know how deep each of those wells 22 is? 23 I do not know that. Α. 24 And how deep is the well on your property, if Q. 25 you know?

Page 149 Α. I would have to refer to specs to look that up. 0. Do any of your neighbors have sheds, if you know? Are -- my neighbors on Asa's Way? Α. 0. Yes. Not that I can think of -- not that I can Α. think of. Q. Do you know whether all of the properties on Asa's Way are impacted by PFOA? MS. JOSELSON: Objection. Do I know why they are impacted? I'm sorry? Α. BY MS. SCHWARZ: No, whether, whether. If they are. 0. Α. Whether the houses on Asa's Way are impacted by PFOA? Q. Yeah. Yes, I believe they are impacted by PFOA. Α. Do you know whether they have -- PFOA was Q. detected in the homes with wells? I can answer that by saying that there was Α. dots on all of my neighbors' houses on the maps, with the exception of one on Susan Taylor Lane.

You consented to a -- being connected to

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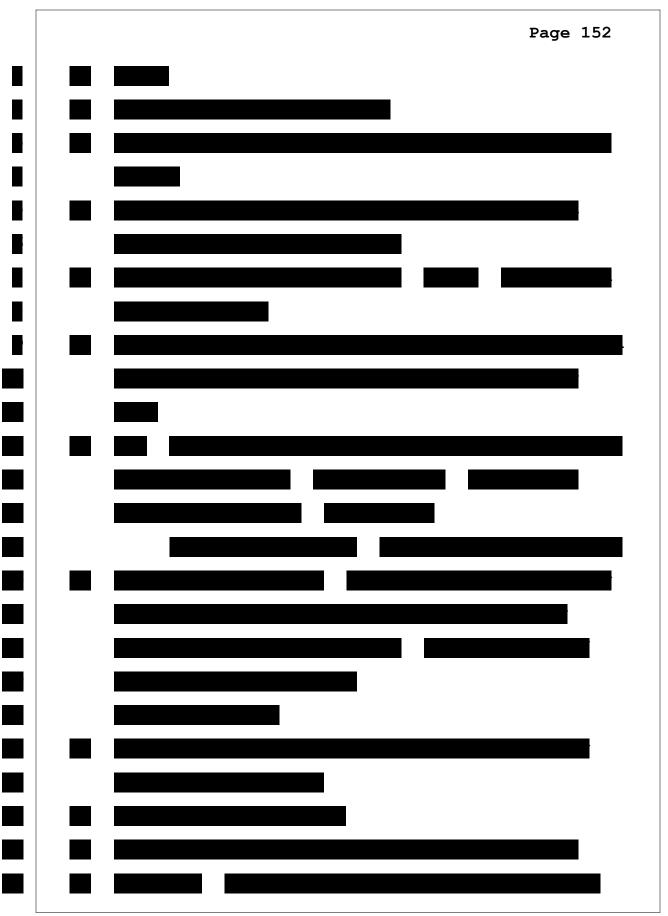
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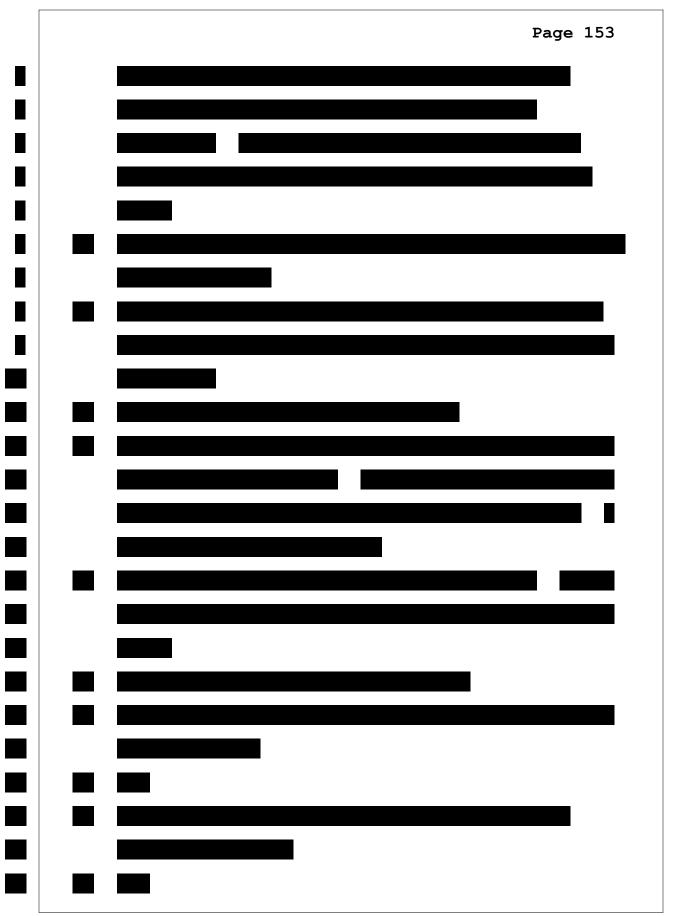
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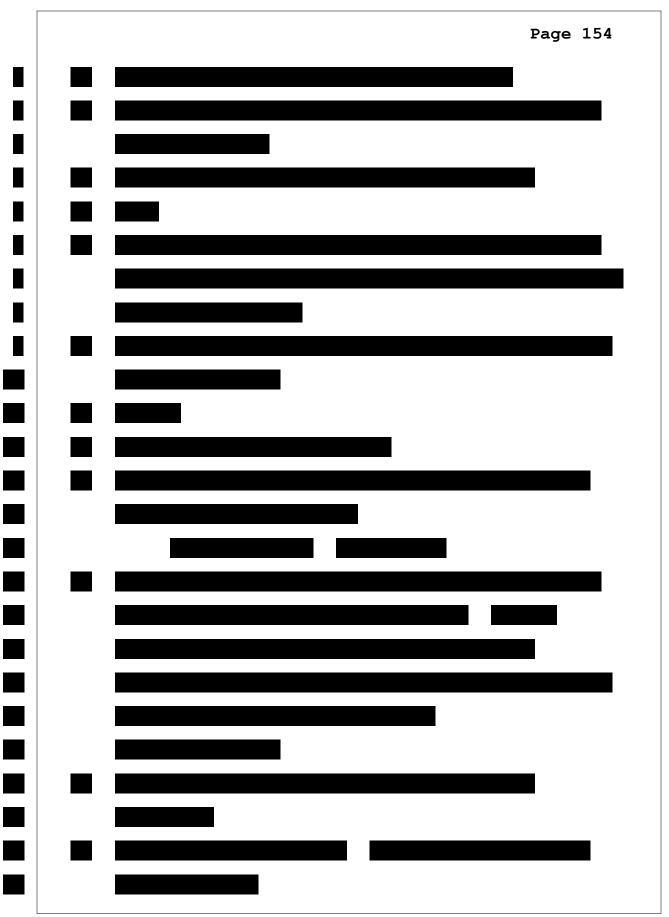
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Page 150 1 municipal water, correct? 2 Α. Yes. 3 And would a connection to public water impact Ο. 4 your damage estimation? 5 MS. JOSELSON: Objection. 6 Α. Would the connection of water impact my damage 7 estimation? 8 BY MS. SCHWARZ: Yeah. I can ask it a different --9 Ο. 10 Α. Yes. 11 Once connected to municipal water, do you Ο. 12 think that that would increase the value of 13 your property? 14 Α. I think it would improve the value of my 15 property. 16 MS. SCHWARZ: Take a five-minute break. 17 MR. SILVER: Okay. THE VIDEOGRAPHER: Is that -- that it? 18 19 The time is now approximately 1:51 p.m. This 20 completes today's testimony of Leslie 21 Addison --22 MS. JOSELSON: We're just taking a break. 23 THE VIDEOGRAPHER: Oh, a break. 24 sorry. 25 The time is 1:51 p.m. Going off the

		Page 151
1		record.
2		(Brief recess taken.)
3		THE VIDEOGRAPHER: The time is now
4		approximately 2:06 p.m. Going back on the
5		record.
6		BY MS. SCHWARZ:
7	Q.	Miss Addison, you're ready to proceed?
8	A.	Yes.

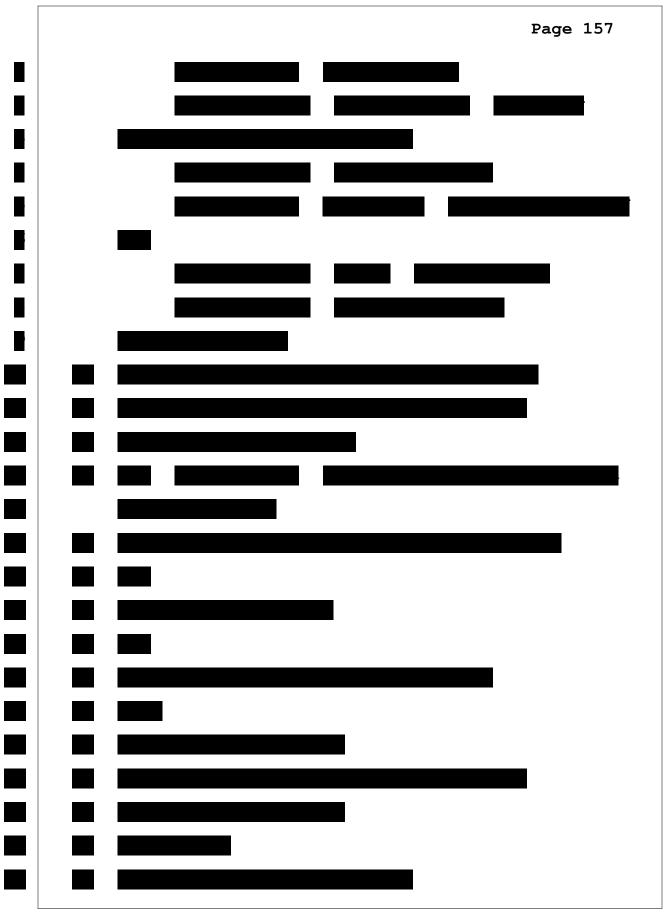






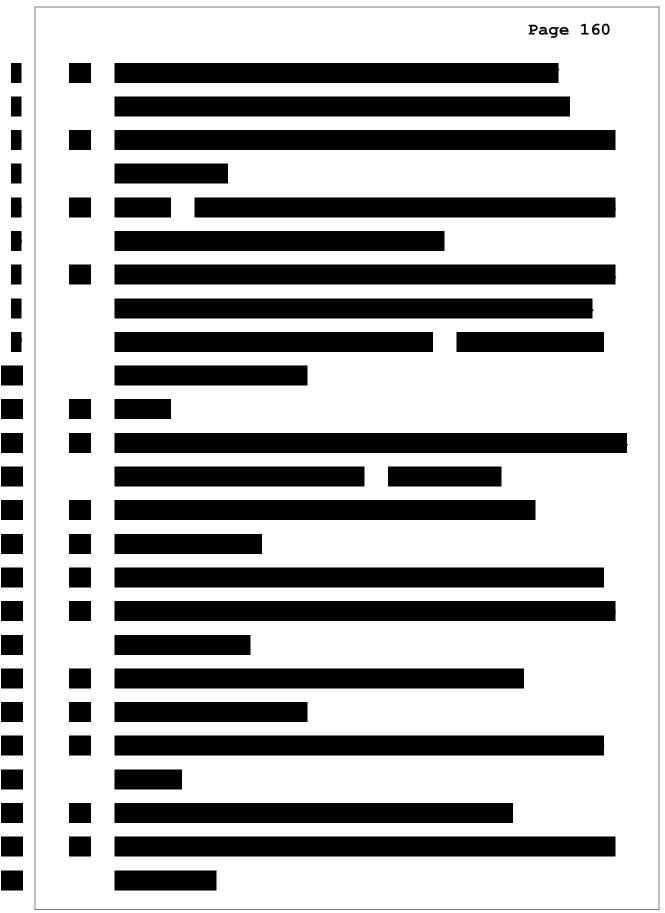


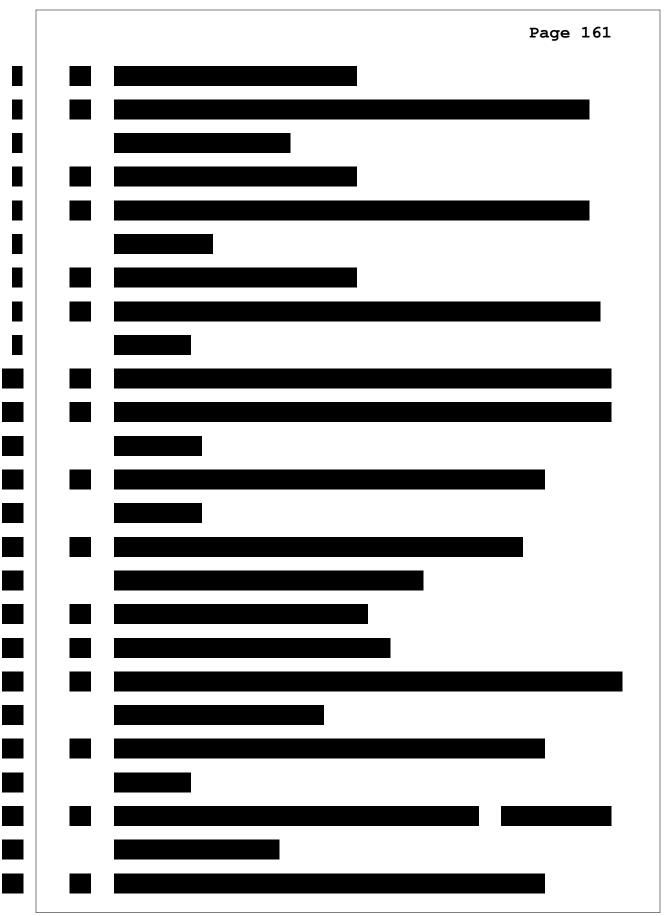


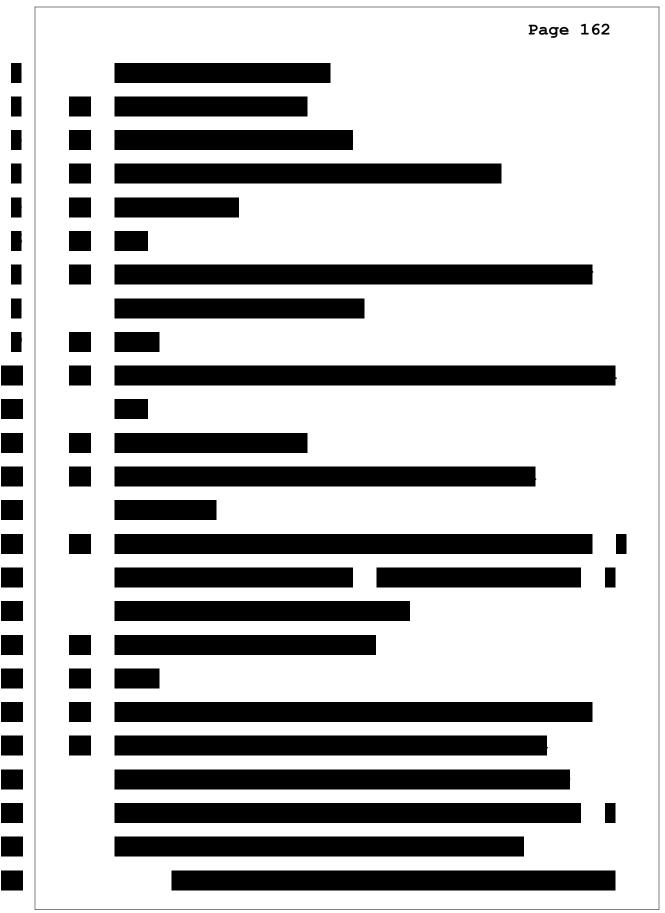


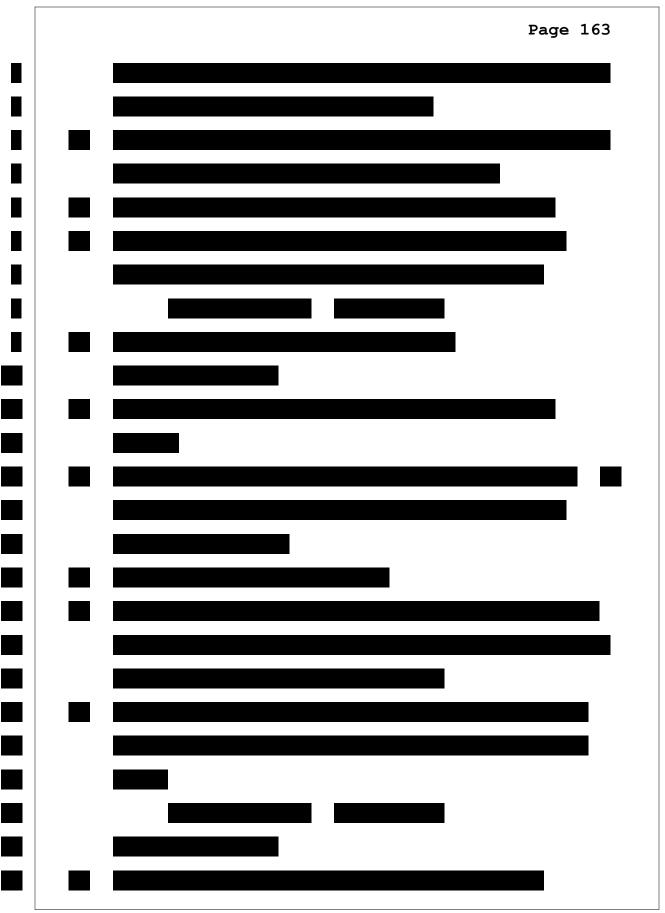


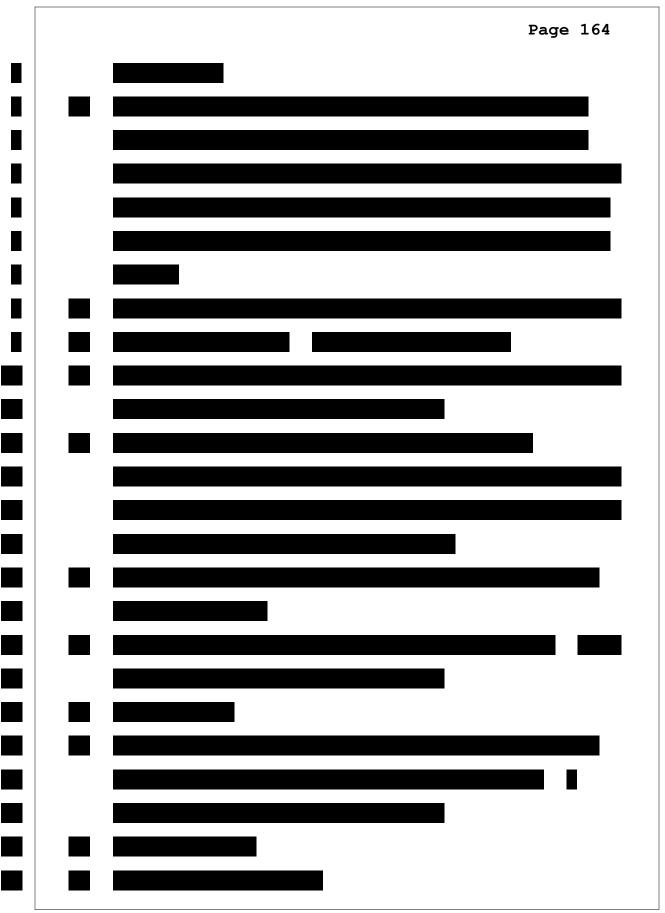


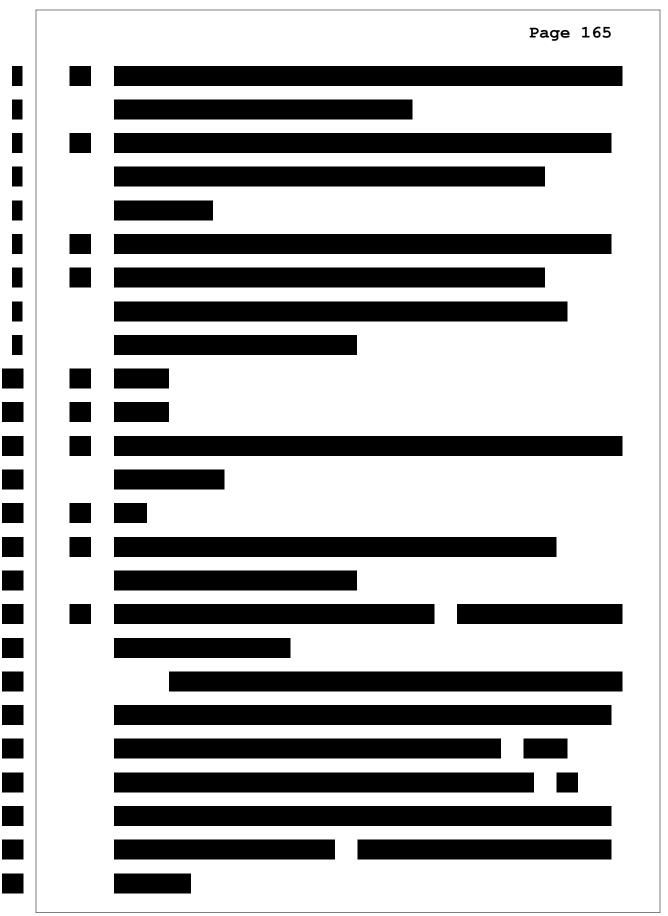




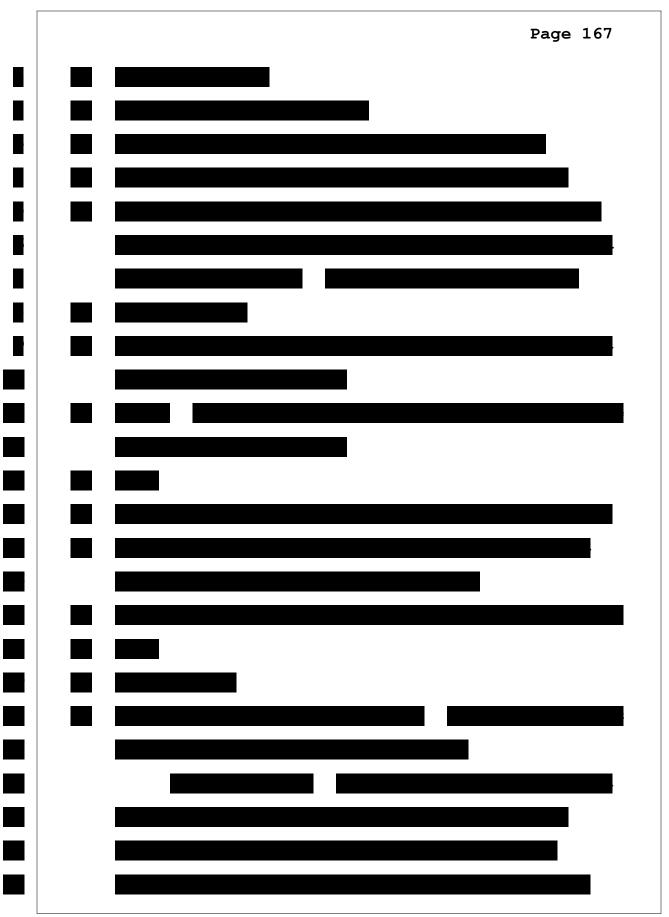


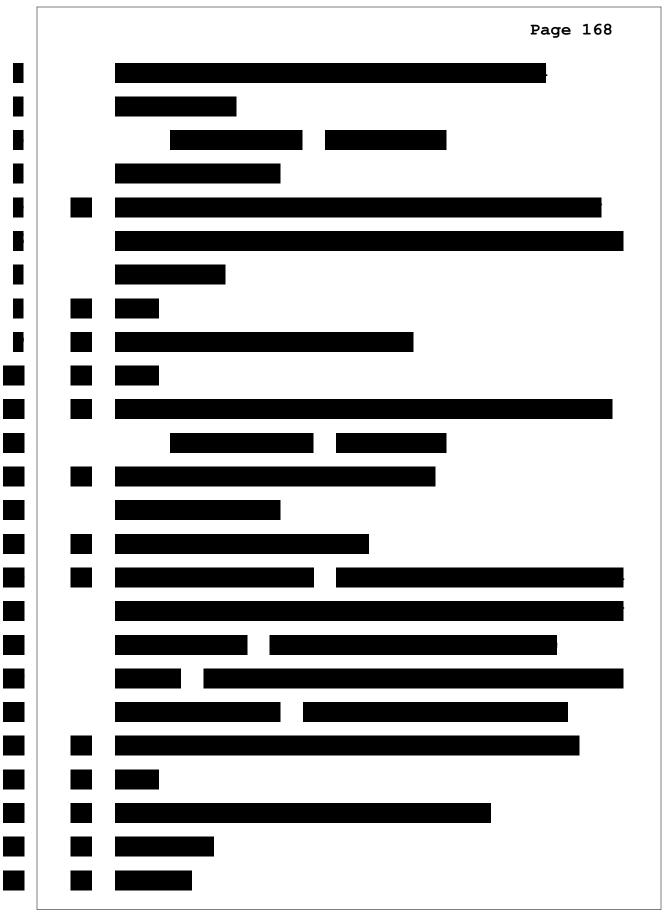




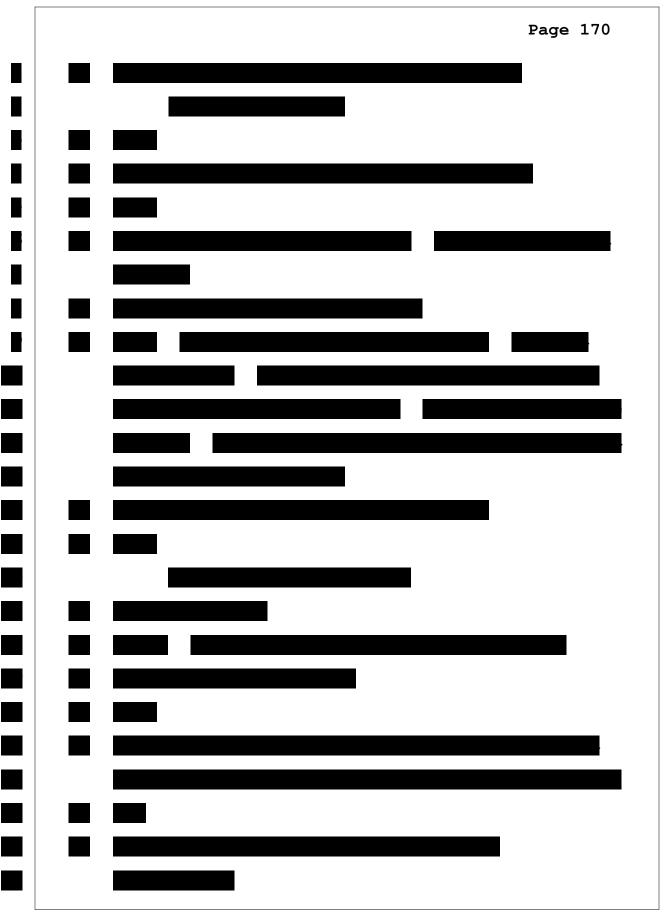






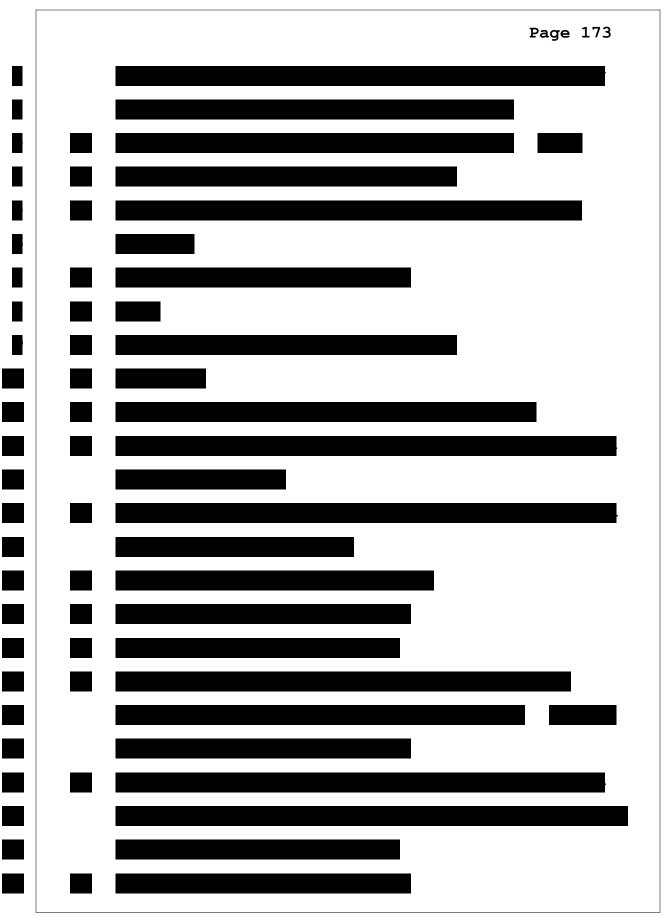


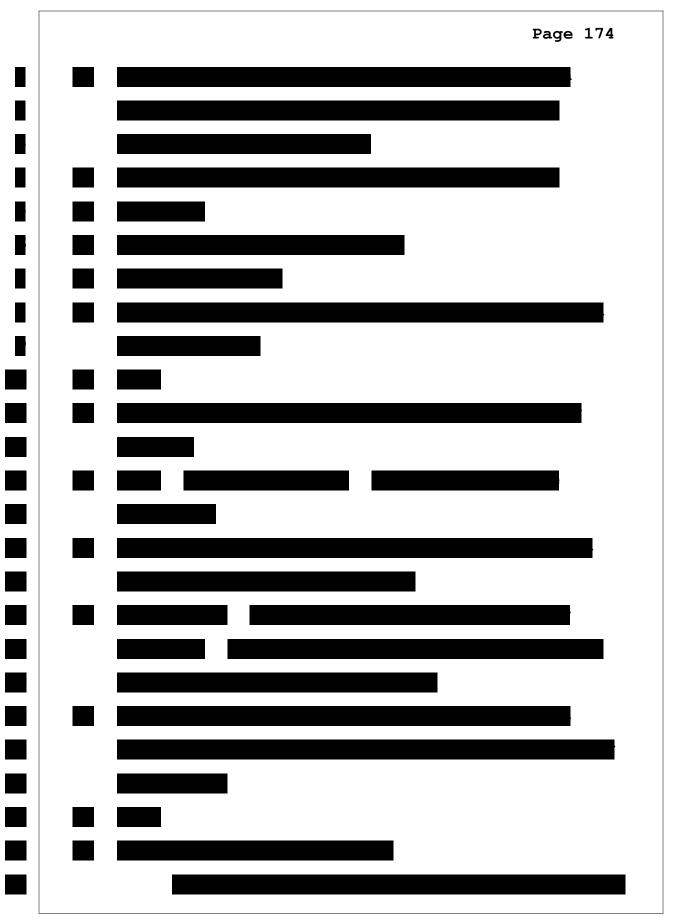


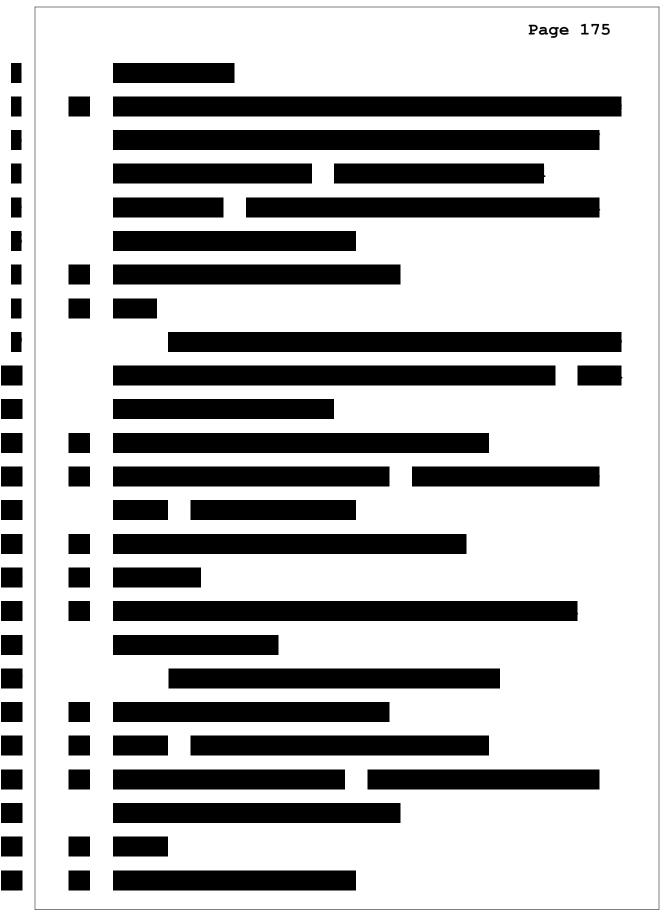


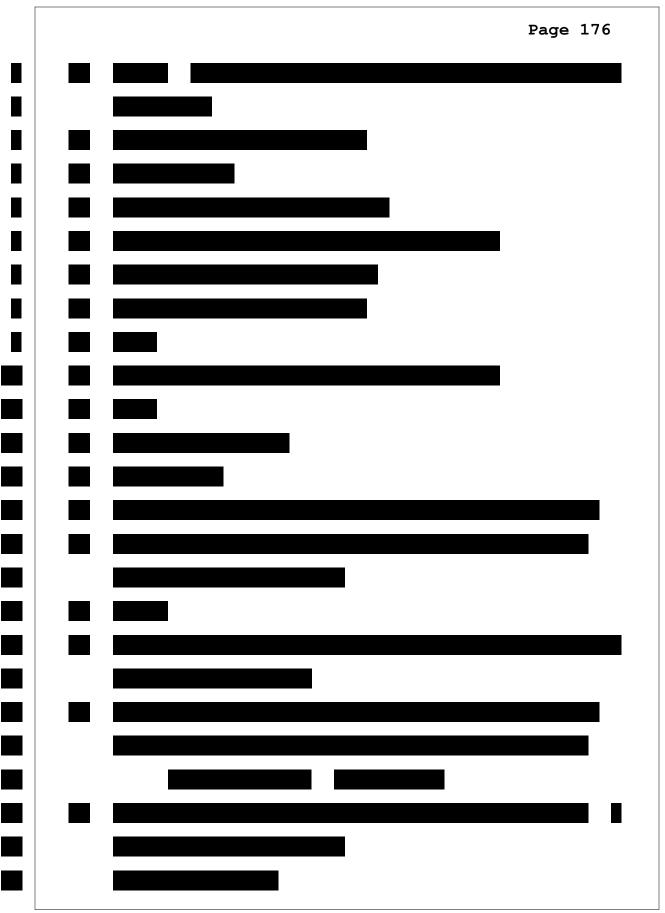












Page 177 5 Miss Addison, do you believe that your Q. 6 groundwater is not usable? 7 Did you testify to that previously, or 8 did I have that down wrong? 9 MS. JOSELSON: Objection. 10 My groundwater? Α. BY MS. SCHWARZ: 11 12 Yes. Q. 13 Α. The water that -- that I tap into --14 Mm-hmm. 0. 15 -- with my well? Α. 16 Ο. Yes. 17 Α. I believe it's not usable. And beyond your well water, are you -- do you 18 Q. 19 distinguish well water from groundwater on 20 your property? 21 Α. No. 22 Q. Have we discussed all the ways in which you 23 believe your use of the your well water has 24 been affected --25 MS. JOSELSON: Objection.

Page 178 1 BY MS. SCHWARZ: 2 Q. -- after the detection of PFOA? 3 Do I believe that we've discussed all the Α. 4 ways? 5 Yes. Ο. 6 Α. I think we touched on many of the ways. 7 There's probably ones I'm not remembering or 8 thinking of right off the top of my head. 9 Q. And do you believe that you currently suffer 10 from any health condition that you believe to 11 be caused by PFOA? 12 Α. I don't believe I have a medical condition 13 that I know of now as a result of PFOA. 14 Can we go off the record? MS. SCHWARZ: 15 THE VIDEOGRAPHER: Sure. The time is now 16 approximately 2:42 p.m. Going off the record. 17 (Brief recess taken.) THE VIDEOGRAPHER: The time is now 18 19 approximately 2:56 p.m. Going back on the 20 record. 21 BY MS. SCHWARZ: 22 Miss Addison, thank you for your time today. Q. 23 I just have one last question on Exhibit 5, 24 which is in front of you. They're Plaintiffs' Response to Saint-Gobain First Set of 25

Page 179 1 Interrogatories. 2 Do you see that? 3 Α. Yes. If you could turn to page 5, No. 6. 4 5 Α. (Witness complying) Identify every medical or other 6 0. And No. 6 is: 7 health condition that plaintiffs believe to 8 have sustained due to PFOA exposure. 9 Α. Yes. 10 And -- and the response the -- it's the last Q. 11 sentence says: Subject to and without waiving 12 the objection, based on blood testing by the 13 Senate of Vermont, we believe that our 14 ingestion of PFOA for many years has already 15 caused deleterious and long-term physiologic 16 alterations and damage to our blood, liver, 17 kidneys, immune system and other organs. 18 Did I read that correctly? 19 Α. Yes. 20 Well, you said Senate of MR. SILVER: 21 Vermont. I think you meant the state of 22 Vermont. 23 MS. SCHWARZ: Oh, I apologize. Yes, by 24 the state of Vermont. 25 BY MS. SCHWARZ:

Page 180 Could you elaborate, please, on the specific long-term and deleterious alterations and damage? Let's start with to your blood. So I'm going to defer to the specialists on Α. this who are knowledgeable about toxic exposure, but I have PFOA in my body. It's I can't remove it. It has some kind there. of potential for havoc. So you believe, consistent with what this Q. says, that you've -- your ingestion of PFOA has already caused these deleterious effects? Do you --Α. The existence of PFOA in my body beyond background level has already caused because it is there now. MS. SCHWARZ: Thank you so much for your time today, Miss Addison. MS. JOSELSON: I just have one follow-up. CROSS-EXAMINATION BY MS. JOSELSON: You were asked about why you were not Q. gardening as you used to on your property. Can you explain -- you said bad

feelings --

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Page 181 1 (Off-the-record colloquy.) 2 BY MS. JOSELSON: 3 Ο. I just have one question. 4 You said you're not gardening as you used 5 Can you explain why since PFOA? 6 MS. SCHWARZ: Objection. 7 So you made reference to me saying -- I was Α. 8 having trouble articulating the feeling that I 9 had and my lack of confidence in that I am not 10 confident PFOA is not getting into my food 11 that I grow in the yard by way of soil, by way 12 of being watered by our hose, by way of just 13 absorption through the soil, despite us using 14 raised beds, which provide some separation. 15 I'm not confident, and it causes me worry and 16 fear. 17 That's all I have. MS. JOSELSON: 18 THE VIDEOGRAPHER: That's it? 19 MS. SCHWARZ: Mm-hmm. 20 THE VIDEOGRAPHER: The time is now 21 approximately 2:59 p.m. This completes 22 today's testimony of Leslie Addison. 23 Going off the record. 24 25

	Page 182
1	ACKNOWLEDGMENT OF DEPONENT
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3	I have read the foregoing transcript of
4	my deposition and except for any corrections or
5	changes noted on the errata sheet, I hereby
6	subscribe to the transcript as an accurate record
7	of the statements made by me.
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9	
10	LESLIE ADDISON
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12	SUBSCRIBED AND SWORN before and to me
13	this day of, 20
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17	NOTARY PUBLIC
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20	My Commission expires:
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Page 183 1 CERTIFICATE I, Beth Gaige, a Registered 2 3 Professional Reporter, hereby certify that the 4 within-named deponent was sworn to testify the 5 truth, the whole truth, and nothing but the truth in the aforementioned cause of action. 7 I further certify that this deposition 8 was stenographically reported by me and later 9 reduced to print through computer-aided 10 transcription, and the foregoing is a full and 11 true record of the testimony given by the 12 deponent. 13 I further certify that I am a 14 disinterested person in the event or outcome 15 of the above-named cause of action. 16 IN WITNESS WHEREOF, I subscribe my hand 17 and affix my seal this 17TH day of April 2018. 18 Beth Gaige 19 20 Beth Gaige, RPR 21 Notary Public 22 My commission expires: August 22, 2019 23 24 25

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2	IN RE:	SULLIV	'AN, et al. vs. SAINT-GOBA	IN
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Federal Rules of Civil Procedure Rule 30

- (e) Review By the Witness; Changes.
- (1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:
- (A) to review the transcript or recording; and
- (B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.
- (2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF SEPTEMBER 1,

2016. PLEASE REFER TO THE APPLICABLE FEDERAL RULES

OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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